

Burnet R. Maybank, III
Member
Admitted in SC

April 18, 2007

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of Alltel Communications, Inc. for Designation as an Eligible
Telecommunications Carrier pursuant to Section 214(e)(2) of the
Communications Act of 1934

Dear Charlie:

Enclosed for filing is the original of Alltel Communications, Inc.'s ("Alltel")
Application for Designation as an Eligible Telecommunications Carrier ("ETC").
The Commission has determined that it can and should consider the merits of ETC
Applications without further delay. Alltel supports the Commission's determination
and respectfully requests the Commission to designate ETC status on Applicants that
satisfy the designation criteria outlined by the FCC.

The attached document is an exact duplicate, with the exception of the form of
the signature of the e-filed copy submitted to the commission in accordance with its
electronic filing instructions.

Yours very truly,



Burnet R. Maybank, III

BRM/caa

**Before The
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

In the Matter of)	
)	
Application of Alltel Communications,)	
Inc. for Designation as an Eligible)	Docket No.
Telecommunications Pursuant to)	
Section 214(e)(2) of the)	
Communications Act of 1934)	

**APPLICATION OF ALLTEL COMMUNICATIONS, INC.
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE STATE OF SOUTH CAROLINA**

Alltel Communications, Inc., on behalf of itself and its wholly-owned and controlled licensee affiliates (“Alltel” or “Company”), and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”), hereby petitions the South Carolina Public Service Commission (“Commission”) for designation as an Eligible Telecommunications Carrier (“ETC”) for purposes of receiving support from the federal universal service fund (“FUSF”). As demonstrated below, Alltel meets all the statutory and regulatory prerequisites for ETC designation and Alltel’s designation will serve the public interest.

I. Alltel’s Universal Service Offering.

Alltel is the licensee authorized to provide Cellular Mobile Radio Service (“CMRS”) in the following Cellular Market Areas in the state of South Carolina: 67, 90, 95, 108, 227, 264, 625, 626, 627, 628, 629, 630, 631, 632 and 633. Alltel intends to obtain high cost support to expand its coverage to include unserved or underserved areas, to increase the service quality and reliability of its network, and to speed the delivery of advanced wireless services to the citizens of South Carolina. As an ETC, Alltel will also offer a universal service package to subscribers

who are eligible for Lifeline support. Alltel's service offering will be competitive with those of the incumbent local exchange carriers ("LECs") and afford eligible South Carolinians a choice in their Lifeline service.

II. Alltel Satisfies All the Statutory and Regulatory Prerequisites for Designation as an ETC for Federal Universal Service Purposes.

A. The South Carolina Public Service Commission Has Jurisdiction to Designate Wireless ETCs.

As a CMRS carrier, Alltel is entitled to seek designation as an ETC.¹ Section 254(e) of the Act provides that "only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support." 47 U.S.C. § 214(e)(2) of the Act states that state commissions "shall designate" and, therefore, clearly authorizes state commissions such as the South Carolina Public Service Commission to designate ETC status for federal universal service purposes, including wireless ETCs. The FCC's March 17, 2005 Federal-State Joint Board on Universal Service Report and Order expressly follows this statute and provides that 47 U.S.C. § 214(e)(2) of the Act "provides state commissions with the *primary* responsibility for designating ETCs" (footnote 2, emphasis added). The South Carolina Public Service Commission has previously exercised such authority and considered Applications by CMRS providers for ETC designation. Consistent with the Commission's precedent, Alltel urges the Commission to exercise its authority and designate Alltel as an Eligible Telecommunication Carrier in the state of South Carolina.

B. Alltel Offers All of the Services Supported By the Federal High-Cost Universal Service Program.

¹ See *Federal-State Joint Board on Universal Service*, First Report and Order, 12 FCC Rcd 8776, 8858-59, ¶145 (1997) ("*First Report and Order*").

In order to be designated as an ETC, a carrier must be a common carrier and both offer and advertise the supported services throughout the designated service area.² The FCC has identified the following services and functionalities as the core services to be offered by an ETC and supported by federal universal service support mechanisms:³

1. Voice-grade access to the public switched telephone network;
2. Local Usage;
3. Dual-tone, multi-frequency (“DTMF”) signaling, or its functional equivalent;
4. Single-party service or its functional equivalent;
5. Access to emergency services;
6. Access to operator services;
7. Access to interexchange service;
8. Access to directory assistance; and
9. Toll limitation for qualifying low-income consumers.

The FCC *Section 214(e)(6) Public Notice* requires a carrier to certify that it provides each of the supported services, or where appropriate, functionally equivalent services.⁴ As shown below and in the Declaration attached as Exhibit A hereto, Alltel currently provides, or will provide upon designation, each of the required services.

1. Voice-grade access to the public switched telephone network:

The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a specified bandwidth.⁵ Alltel meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with

2. 47 U.S.C. §214(e)(1)

³ See 47 C.F.R. § 54.101(a)

⁴ *Section 214(e)(6) Public Notice*, 12 FCC Rcd at 22948.

⁵ *First Report and Order*, 12 FCC Rcd at 8810-11.

LECs, each of Alltel's customers is able to make and receive calls on the public switched telephone network within the specified bandwidth.

2. Local Usage:

Section 54.202(A)(4) of the FCC rules require an ETC Applicant to "demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation." The FCC has explained that an ETC applicant's local usage plans should be reviewed on a case-by-case basis to ensure that each ETC provides a local usage component in its universal service offering that is comparable to the plan offered by the incumbent LEC in the area.⁶ The FCC has declined to adopt a specific local usage threshold.⁷ Alltel commits to provide rate plans that include a substantial local calling area with a corresponding level of included local usage that provides an outstanding consumer value. A description of Alltel's current rate plans that are generally available in the areas for which Alltel seeks ETC designation is attached as Exhibit B hereto. Exhibit B confirms that Alltel includes local usage in each rate plan and that Alltel offers local calling areas that are substantially larger than those offered by the incumbent LECs. Further, since Alltel offers multiple universal service rate plans, customers have the opportunity to select a rate plan that best meets their needs based on the local calling areas and the amount of local calling included in each plan. Lastly, because a competitive ETC receives universal service support only for those customers that it serves, a competitive ETC provider must deliver a competitive service package in order to attract customers and, thereby, receive funds.

3. Dual-tone, multi-frequency ("DTMF") signaling, or its functional equivalent:

⁶ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 20 FCC Rcd 6371 (2005) ("*ETC Criteria Order*").

⁷ *ETC Criteria Order*, 20 FCC at 6385.

DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement.⁸ Alltel currently uses out-of-band digital signaling, and Alltel therefore meets this requirement.

4. Single-party service or its functional equivalent:

“Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line.⁹ The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission.¹⁰ Alltel meets the requirement of single-party service in this manner.

5. Access to emergency services:

Access to emergency services includes access to services such as 911 and enhanced 911, provided by local Public Service Answering Points (“PSAPs”). The FCC requires that a carrier provide access to enhanced 911 (“E911”) when a PSAP submits a compliant request to the carrier. Alltel currently provides its customers with access to emergency services by dialing 911 in accord with this requirement throughout the geographic area where it is seeking ETC designation. Alltel also delivers both automatic numbering information (“ANI”) and automatic location information (“ALI”) data to PSAPs capable of both receiving and utilizing the data and that have made arrangements for the delivery of the data.

6. Access to operator services:

⁸ 47 C.F.R. §54.101(a)(3).

⁹ *First Report and Order*, 12 FCC Rcd at 8810.

Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call.¹¹ Alltel meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (*e.g.* LECs, IXC, etc.)

7. Access to interexchange service:

A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Alltel presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements between the Company and several IXCs. On most of the Company's rate plans, interexchange calls can be made for no additional charge (*i.e.*, all outgoing minutes are treated the same). Additionally, customers are able to reach other IXCs by dialing the appropriate access code or dial-around number.

8. Access to directory assistance:

The ability to place a call to directory assistance is a required service offering.¹² Alltel meets this requirement by providing all of its customers with access to directory assistance by dialing either "411" or "Area Code + 555-1212".

9. Toll limitation for qualifying low-income consumers:

An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline customers at no charge. The FCC no longer mandates an ETC to provide both services as part of the toll limitation service requirement.¹³ In particular, all ETCs must provide toll blocking,

¹⁰ *Id.*

¹¹ *Id.* at 8817-18.

¹² *Id.* at 8821.

¹³ 47 C.F.R. § 54.101 (a)(9). *See Federal-State Joint Board Universal Service*, Fourth Order on Reconsideration, 13 FCC Rcd 5318, 5388 (1997).

which allows customers to block the completion of outgoing toll calls.¹⁴ Once designated as an ETC in the state of South Carolina, Alltel will provide Lifeline service as required and also provide toll blocking capability in satisfaction of the FCC's requirement. Alltel currently has the capability to provide toll blocking and will provide this service at no charge to its Lifeline customers.

C. Alltel Satisfies the Eligibility Criteria Adopted by the FCC Which is the Subject of 26 S.C. Code Ann. Regs. 103-690.

The FCC's March 17, 2005 Report and Order established additional criteria that all ETC applicants must satisfy in order to be designated ETC status by the FCC. The FCC encouraged states to adopt the same requirements noting that the application of a common set of requirements by the FCC and the states will provide a more predictable designation process and improve the sustainability of the universal service fund. The South Carolina Public Service Commission initiated Docket No. 2006-37-C to consider whether it should adopt the FCC criteria for purposes of designating ETC status. On March 27, 2007, the Commission issued Order No. 2007-193 in Docket No. 2006-37-C. Order No. 2007-193 stated that *the Commission believed it can and should move forward to consider ETC applications on a case-by-case basis pursuant to the provisions of Section 214(e)(2) of the Communications Act until a final determination is made in Docket No. 2006-37-C*. In its March 27, 2007 Order, the Commission also requested input from interested parties on whether it should apply the FCC designation criteria, when considering ETC Applications during the interim period, prior to the adoption of final rules. *Alltel submits that, even though the Commission has not formally adopted the FCC ETC designation criteria, it is willing to comply with and is capable of complying with the FCC designation criteria if required by the Commission.*

¹⁴ *First Report and Order*, 12 FCC Rcd at 8821-22.

The FCC's March 17, 2005 Report and Order established additional criteria that all ETC applicants must satisfy in order to be designated ETC status. The FCC found that an ETC applicant must demonstrate: (1) a commitment and ability to provide the supported services throughout the designated area; (2) the ability to remain functional in emergency situations; (3) that it will satisfy consumer protection and service quality standards; (4) that it offers local usage comparable to that offered by the incumbent LEC; and (5) an acknowledgement that it may be required by the FCC to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to Section 214(e)(4) of the Act.¹⁵

1. Commitment and Ability to Provide the Supported Services:

§54.202(a)(1) of FCC rules require an ETC applicant to demonstrate its commitment and ability to provide the supported services throughout the designated service area by: (A) committing to provide service throughout its proposed ETC designated service area to all potential customers making a reasonable request for service; and (B) submitting a five-year plan demonstrating how high cost universal service support will be used to improve its coverage, service quality and capacity throughout the service area for which it seeks ETC designation.

A. Commitment to Serve All Customers Making a Reasonable Request for Service:

Alltel certifies that: (1) it will provide service throughout the proposed ETC area using its standard customer equipment and service offerings where available; or (2) if a request within Alltel's licensed service area but outside its existing network coverage is received from a potential customer, Alltel will follow the steps described in Section 54.202(a)(1)(a) of the FCC rules. If, after following the steps specified therein, Alltel still cannot provide service, it

¹⁵ *ETC Criteria Order*, 20 FCC Rcd at 6386-87.

will notify the requesting party and report the unfulfilled request to the Commission within 30-days after making such a determination. Furthermore, consistent with the requirement in Section 54.209(a)(3) of the FCC rules, Alltel will annually report the number of requests from potential customers that were unfulfilled during the pervious year. Alltel submits the above described service provisioning commitments will ensure that Alltel is responsive to consumers' needs in the ETC service areas, while acting as a proper steward of available high-cost support funds.

B. Five Year Service Improvement Plan:

Alltel commits to provide its proposed five-year Service Improvement Plan ("Plan") upon the adoption of a Protective Order or as otherwise directed by the Commission. The Plan will describe projected improvements and expenses associated with upgrading and maintaining Alltel's existing network in the ETC designated areas. Alltel submits that such plans must be flexible and will be subject to change in response to general consumer demand, changes in technology and other appropriate factors. Further, the priority under which each cell site/network improvement project is deployed is subject to change depending upon requests for service and other market factors. Finally, Alltel also commits to annually provide the Commission a progress report consistent with §54.209(a)(1) of the FCC rules. Alltel's plan will constitute a good faith estimate of the universal service benefits – due to expanded coverage and improved signal and service quality - that customers in the state of South Carolina will enjoy if the Commission designates Alltel as an ETC in the requested areas.

2. Ability to Remain Functional in Emergency Situations:

Alltel is able to remain functional in emergency situations. Alltel's network is designed to remain functional in emergency situations. Alltel has adequate amounts of back-up power to ensure functionality without an external power source, is able to reroute traffic around

damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.¹⁶

Alltel has deployed fixed and portable back up power generators at various locations throughout its network that can be deployed in emergency situations. These back up power generators are capable of keeping a cell site up and running until power is restored to the cell site, until system changes are made to reroute traffic or until a cell site on wheels (COW) is deployed. Alltel tests its back-up power generators regularly to ensure functionality. Alltel is capable of and will reroute traffic around damaged or out of service facilities by changing call routing translations as needed. Alltel is also able to deploy COWs as temporary cell sites when existing facilities are damaged or out of service for longer periods of time. Further, by changing call routing translations or deploying cell sites on wheels, Alltel is able to manage traffic spikes throughout its network. As a long-term solution for managing increased traffic levels and traffic spikes, Alltel increases capacity at its cell sites, switches and transport facilities.

Finally, in accordance with FCC rule Section 54.209(a)(6) Alltel will annually certify that it is able to function in emergency situations. Alltel will also fulfill the annual outage reporting requirement described in §54.209(a)(2) of the FCC rules. §54.209(a)(2) of the FCC rules requires an ETC applicant to submit detailed information on any outage of at least 30 minutes in duration that potentially affects (a) at least ten percent of the end users served in a designated service area; or (b) a 911 special facility. Specifically, such a report must include information detailing: (a) the date and time of onset of the outage; (b) a brief description of the outage and its resolution; (c) the particular services affected; (d) the geographic areas affected by the outage; (e) steps taken to prevent a similar situation in the future; and (f) the number of

¹⁶ 47 C.F.R. § 54.202(a)(2).

customers affected.¹⁷

3. Consumer Protection:

FCC rule §54.202(a)(3) states an ETC applicant must “demonstrate that it will satisfy applicable consumer protection and service quality standards.” The FCC has determined that a commitment by wireless applicants to comply with the Cellular Telecommunications and Internet Association’s Consumer Code for Wireless Service (“CTIA Consumer Code”) satisfies this requirement. Other commitments will be considered on a case-by-case basis.” Alltel has already committed to abide by the CTIA Consumer Code, for its entire wireless operations across the country, not simply those states in which it seeks ETC status. Although its commitment to this code goes well beyond a simple inducement to the Commission for the grant of ETC status, Alltel specifically commits that, as an ETC, Alltel will abide by the CTIA Consumer Code with respect to its ETC service areas.

In addition to its commitment to the CTIA Consumer Code, Alltel has taken several steps, on its own initiative, to further protect its customers and enhance service quality. For example, Alltel offers its customers an automatic one-minute credit for all dropped calls on its network. Alltel does not require a customer to call and report such instances. Instead, Alltel monitors its network for dropped calls and automatically credits customers’ accounts for dropped calls. In another initiative, in recognition of the fact that changing circumstances and needs may require customers to opt for a different rate plan, Alltel offers its customers the ability to change rate plans at anytime without extending (their) current service contracts. These are two initiatives taken by Alltel to further care for its customers. Finally, if designated as an ETC, Alltel will satisfy the requirements in Sections 54.209(a)(5) and 54.209(a)(4) of the FCC rules by

¹⁷ 47 C.F.R. § 54.209 (a)(2).

annually certifying its compliance with the CTIA Consumer Code and annually reporting the number of customer complaints per thousand handsets.

4. Local Usage:

As described in Section II (B)(2) of this Application and demonstrated in Exhibit B hereto, Alltel is committed to offering local usage plans comparable to those offered by the incumbent LEC in the service areas for which it seeks designation. Each of Alltel's service plans described in Exhibit B are within the scope of "comparability" as defined by the FCC in its March 17, 2005 Report and Order.¹⁸ Further, Alltel will annually certify that it offers local usage plans that are comparable to those offered by the incumbent LEC in the relevant areas in accordance with Section 54.209(a)(7) of the FCC rules.

5. Equal Access:

In accordance with Section 54.202 (a)(5) of the FCC rules, Alltel acknowledges that the FCC may require it to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the designated ETC area.¹⁹ Further, pursuant to Section 54.209(a)(8) of the FCC rules, Alltel will file an annual certification acknowledging the fact that it may be required by the FCC to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

D. Alltel Will Offer Supported Services Using a Combination of its Own Facilities and Resale of Another Carrier's Services.

The FCC's *Section 214(e)(6) Public Notice* established that a carrier requesting designation must certify that it offers the supported services "either using its own facilities or a

¹⁸ *ETC Criteria Order*, 20 FCC Rcd at 6385.

¹⁹ 47 C.F.R. § 54.202(a)(5).

combination of its own facilities and resale of another carrier's services."²⁰ Alltel will provide the supported services using its own network infrastructure, consisting of antennas, cell-sites, towers, trunkings, mobile switching, and interconnection facilities. Alltel may, on a limited basis, provide service through resale of another carrier's service in areas lacking adequate coverage. *See also* Exhibit A.

E. Alltel Will Advertise its Universal Service Offerings.

Alltel will advertise the availability of the supported services and the corresponding charges in a manner that fully informs the general public within the designated service area of both the available services and the associated rates.²¹ Alltel currently advertises its services through a variety of advertising media including newspapers, television, radio, public exhibits and displays and the Company website. Alltel will utilize the same media to advertise the universal service offerings throughout the ETC designated areas. Further, Alltel commits to advertise the availability of Lifeline and Link-Up discounts throughout the ETC designated areas.

III. Alltel Requests ETC Designation Through-out its Licensed Area in the State of South Carolina.

Alltel, in its capacity as a provider of cellular services, is not a "rural telephone company" as that term is defined by 47 U.S.C. Section 153(37). Accordingly, Alltel is required to describe the geographic area in which it requests designation.²² In this Application, Alltel requests ETC designation in the "non-rural" telephone company wire centers listed in Exhibit C and the "rural" telephone company study areas listed in Exhibit D. A map identifying Alltel's proposed ETC service area is attached hereto as Exhibit E.

²⁰ *Section 214 Public(e)(6) Public Notice*, 12 FCC Rcd at 22949.

²¹ *Id.*

²² *Id.*

Non-Rural Telephone Company Service Areas:

Pursuant to Section 54.207 of the FCC's rules, a "service area" is a "geographic area established by a state commission for the purpose of determining universal service obligations and support mechanisms."²³ Applicable FCC rules do not impose restrictions on how a state commission defines a non-rural "service area" for purposes of designating a competitive ETC because the potential for cream-skimming does not exist in the "service areas" served by non-rural telephone companies. Consequently, ETC designations in the non-rural telephone company areas are made at the wire center level. Accordingly, Alltel requests ETC designation in the non-rural telephone company wire centers listed in Exhibit C of this Application. Further, consistent with FCC rules and Orders, Alltel is not seeking ETC designation in the non-rural telephone company areas below the wire center level. Alltel commits to serve and will serve the non-rural telephone company wire centers listed in Exhibit C of this Application in their entirety. The map attached hereto as Exhibits C-1 identifies the non-rural telephone company wire centers that Alltel commits to serve and will serve in their entirety upon ETC designation.

Rural Telephone Company Service Areas:

In an area served by a rural telephone company, the FCC's rules define "service area" to mean the LEC study area unless a different definition of service area is established for such a company.²⁴ The rural LEC study areas that Alltel serves in their entirety are set forth in Exhibit D attached hereto. The map attached hereto as Exhibits D-1 identifies the rural telephone company service areas that Alltel commits to serve and will serve in their entirety upon ETC

²³ 47 C.F.R. § 54.207(a).

²⁴ See 47 C.F.R. § 54.207(b); see also *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking, 16 FCC Rcd 11244 (2001) ("MAG Fourteenth Report and Order").

designation. Alltel is not requesting the Commission to redefine the study area requirement in this Application. Because of Alltel's commitment to serve all the rural telephone company study areas (identified in Exhibit D) in their entirety, the Commission may designate Alltel as an ETC in those areas upon a finding that such designation is in the public interest (see Section IV below).²⁵

IV. Granting This Application Will Serve the Public Interest.

Prior to designating an eligible telecommunications carrier, the Commission must determine that such a designation is in the public interest.²⁶ The FCC, in the *ETC Criteria Order*, codified a fact-specific public interest analysis it had developed in prior orders as the appropriate process for determining that an ETC designation is in the public interest. The FCC determined that, in the case of an applicant seeking designation in an area served by a rural telephone company, it will consider the benefits of increased consumer choice, and the unique advantages and disadvantages of the applicant's service offering, as well as creamskimming issues when redefinition is requested. As demonstrated below, the Commission should find that designating Alltel as an ETC will serve the public interest.

A. Benefits of Increased Consumer Choice.

The FCC has recognized that designation of wireless ETCs promotes competition and benefits consumers in rural, high cost areas by increasing consumer choice, availability of innovative services and deployment of new technologies. Designating Alltel as an ETC will bring to rural South Carolina customers the benefits described above that are otherwise available commonly to urban customers. Availability of universal service funds will enable Alltel to

²⁵ 47 U.S.C. § 214(e)(2).

²⁶ 47 U.S.C. § 214(e)(6); 47 C.F.R. § 54.202(c).

improve service quality and coverage in areas that it currently serves, and expand its services into areas that would not be economically feasible to serve absent universal service funding.

Universal service funding will enable Alltel to continue to operate and maintain a higher number of cell sites in high cost, low-density areas. Upon ETC designation, Alltel will offer qualifying customers a choice in their Lifeline/Link-Up provider. The mobility of wireless service will offer qualifying Lifeline/Link-Up customers an alternative means of communications that they do not currently enjoy. Further, improving and expanding the choices available to consumers will not only strengthen inter-modal wireless/wireline competition but also increase intra-modal wireless competition to the benefit of telecommunications customers throughout South Carolina. Finally, increased competition in the rural areas provides incentives to incumbent service providers to achieve new operating efficiencies and introduce additional choices, higher quality and better value to their customers.

B. Unique Advantages and Disadvantages of Alltel's Service Offering.

Designating Alltel as an ETC will also bring customers the unique advantages of mobility. The FCC recognized the unique advantages of mobility when it stated that:

[T]he mobility of telecommunications assists consumers in rural areas who often must drive significant distances to places of employment, stores, schools, and other critical community locations. In addition, the availability of a wireless universal service offering provides access to emergency services that can mitigate the unique risks of geographic isolation associated with living in rural communities.²⁷

Further, because Alltel's local calling areas are significantly larger than those of the incumbent LEC, Alltel's customers will be subject to fewer toll charges and will be able to communicate across greater distances more frequently. Alltel will make available several offerings to its customers with varying amounts of local calling and different local calling areas,

²⁷ *Virginia Cellular*, 19 FCC Rcd at 1576.

allowing customers to choose a universal service offering that best suits their particular calling needs.

The FCC has acknowledged that the disadvantages of wireless service may include dropped calls and poor coverage.²⁸ However, the FCC found that Virginia Cellular's assurances to build new towers to improve coverage, its commitments to comply with the CTIA Code for Wireless Service and annually report the number of complaints per 1,000 handsets adequately addressed any concerns about the quality of Virginia Cellular's service.²⁹ Alltel understands that its business is built on customer satisfaction as evidenced by its recent initiative to voluntarily credit customers' accounts for dropped calls. Further, Alltel is a signatory to the CTIA Consumer Code for Wireless Service for its entire operations, not only its ETC designated areas.

In addition, Alltel commits to maintain and construct cell sites in order to improve coverage, service quality and capacity. Alltel has committed to submit a five-year service improvement plan that estimates how high cost universal service support will be used to improve its network. Finally, as described in Section II(C)(1)(A) of this application, Alltel has committed to respond to reasonable requests for service from potential customers that are within the ETC designated area, as required by Section 54.202(a)(1)(A) of the FCC rules. In instances where a request for service is received from a potential customer within the ETC area but outside Alltel's existing network coverage, Alltel has committed to take the steps required by the rules to respond to such request. Alltel's commitments to a network improvement plan and to respond to reasonable requests for service within the designated area mitigate any concerns that may exist regarding Alltel's network quality. Thus, grant of this petition will serve the public interest.

C. Creamskimming.

²⁸ *Virginia Cellular*, 19 FCC Rcd at 1576-77..

²⁹ *Id.*

Alltel is not requesting the Commission to redefine the study area requirement in this Application because Alltel commits to serve the rural telephone company service areas identified in Exhibit D in their entirety. Therefore, designating Alltel as an ETC is in the public interest and the Commission should expeditiously proceed to grant this Petition.

V. High Cost Certification.

Under Sections 54.313 and 54.314 of the FCC's rules, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, must self-certify with the FCC and the Universal Service Administration Corporation ("USAC") their compliance with Section 254(e) of the Act. Alltel commits to use available federal high cost support for its intended purposes – the provision, maintenance and upgrading of facilities and services for which support is intended.

Therefore, Alltel respectfully requests that the Commission issue a finding that Alltel has met the high-cost certification requirement and that Alltel is, therefore, entitled to begin receiving high-cost support as of the date it receives a grant of ETC status in order that funding will not be delayed.³⁰

VI. Conclusion.

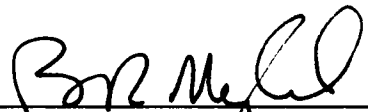
Alltel has received ETC designation in the states of Alabama, Arkansas, California, Colorado, Florida, Iowa, Idaho, Kansas, Louisiana, Michigan, Minnesota, Mississippi, Montana, Nebraska, North Carolina, North Dakota, New Mexico, Nevada, Oklahoma, South Dakota, Texas, Utah, Virginia, Wisconsin, West Virginia and Wyoming. As an ETC, Alltel is required to comply with the FCC ETC designation criteria outlined in this Application, which is also the subject of Docket No. 2006-37-C, in a majority of those states. Therefore, Alltel is familiar with

³⁰ See 47 C.F.R. § 54.307(d). See also *Guam Cellular and Paging, Inc. Petition for Waiver of FCC Rule Section 54.314 of the Commission's Rules and Regulations*, 18 FCC Rcd 7138 (2003).

and complies with the requirements identified in this Application. Given Alltel's commitment and ability to comply with the designation criteria being contemplated in Docket No. 2006-37-C, Alltel respectfully requests that the Commission grant its request for ETC designation on an expedited basis.

Respectfully submitted,

Alltel Communications, Inc.

By: 
Burnet R. Maybank, III

Counsel for Alltel Communications, Inc.

Date: April 18, 2007

EXHIBIT A

AFFIDAVIT

I, Gene DeJordy, do hereby declare under penalty of perjury as follows:

1. I am the authorized representative of Alltel Communications, Inc. ("Alltel") in charge of Alltel's Application for Designation as an Eligible Telecommunications Carrier ("ETC") in the State of South Carolina. This affidavit is submitted in support of that Application.
2. Alltel is authorized to provide cellular mobile radio telephone service in the State of South Carolina and is authorized to provide service in the requested ETC area described in its Application.
3. Alltel meets the criteria for ETC designation as explained herein.
4. Alltel is a "common carrier" for purposes of obtaining ETC designation pursuant to 47 U.S.C. § 214(e)(1). A "common carrier" is generally defined in 47 U.S.C. § 153(10) as a person engaged as a common carrier on a for-hire basis in interstate communications by wire or radio. Section 20.9(1)7 of the Commission's Rules provides that cellular service is a common carrier service. *See* 47 C.F.R. § 20.9(a)(7).
5. Alltel currently offers and is able to provide the services and functionalities identified in 47 C.F.R. § 54.101(a). Each of these services and functionalities is discussed more fully below.
 - a. Voice-grade access to the public switched telephone network. The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a bandwidth of approximately 2700 Hertz frequency range. *See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, First Report and Order*, 12 FCC Rcd 8776, 8810-11 (1997) ("*Universal Service Order*"). Alltel meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with local telephone companies, all customers of Alltel are able to make and receive calls on the public switched telephone network within the specified bandwidth.
 - b. Local Usage. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. Although the FCC had previously deferred a determination on the amount of local usage carriers would be required to provide as part of its universal service offering, it recently declined to adopt a specific local usage threshold. *See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, FCC 05-46, Report and Order* ¶32. The FCC concluded that a competitive ETC offer a local usage plan comparable to the one offered by the incumbent Local Exchange Carrier (LEC) in the service areas for which it seeks ETC designation. Alltel meets the FCC's local usage requirement by offering customers (a) local usage plans which include a

predetermined level of local usage; and (b) a universal service offering that provides a comparable value to the one offered by the incumbent LEC.

- c. Dual-tone, multi-frequency (“DTMF”) signaling, or its functional equivalent. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement. 47 C.F.R. § 54.101(a)(3). Alltel currently uses out-of-band digital signaling and in-band multi-frequency (“MF”) signaling that is functionally equivalent to DTMF signaling. Alltel therefore meets the requirement to provide DTMF signaling or its functional equivalent.
- d. Single-party service or its functional equivalent. “Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line. *Universal Service Order* at 8810. The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission. *Universal Service Order* at 8810. Alltel meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.
- e. Access to emergency services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Phase I E-911, which includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), is only required if a public emergency service provider makes arrangements with the local provider for the delivery of such information. Alltel currently provides all of its customers with access to emergency service by dialing 911 in satisfaction of the basic 911 requirement, and either provides, or will provide subscribers with Phase I and Phase II E-911 services in accordance with the deployment schedules agreed to by Alltel and local emergency service provider.
- f. Access to operator services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call. *Universal Service Order*, 8817-18. Alltel meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (e.g., LECs, IXC, etc.).
- g. Access to interexchange services. A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Equal access, however, is not required. “The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms.” *Universal Service Order* at 8819. Alltel presently meets this requirement by providing all of its customers with the ability

to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with IXC's.

- h. Access to directory assistance. The ability to place a call to directory assistance is a required service offering. *Universal Service Order* at 8821. Alltel meets this requirement by providing all of its customers with access to directory assistance by dialing "411" or "XXX-555-1212".
- i. Toll limitation for qualifying low-income consumers. An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service required under 47 C.F.R. § 54.101(a)(9). *See Universal Service Fourth Order on Reconsideration*, FCC 97-420 (Dec. 30, 1997). In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls. *Universal Service Order*, at 8821-22. Alltel currently has no Lifeline customers in the ETC requested area because only carriers designated as an ETC can participate in Lifeline. *See* 47 C.F.R. § 54.400-415. Once designated as an ETC, Alltel will participate in Lifeline as required, and will provide toll blocking capability in satisfaction of the FCC's requirement. Alltel currently has the technology to provide toll blocking and will use this technology to provide the service to its Lifeline customers, at no charge, as part of its universal service offerings.

6. I declare under penalty of perjury that the foregoing is true and correct. Executed on April 17, 2007.



Gene DeJordy
Senior Vice President – Regulatory Counsel
Alltel Communications, Inc.
Its Authorized Representative

EXHIBIT B



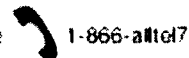
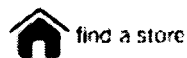
PERSONAL



Shop Online | Personal | Business | Corporate
Customer Service | Store Locator | Español

Home | Personal | Wireless | Plans | Individual Plans

3WAYS TO
BUY



<< BACK TO PLANS

Individual Plans

National Freedom

Greater Freedom

North American Freedom

Smart Choice Packs

National Freedom from Alltel offers extensive coverage at great rates. With this flexible plan, you're free to make calls to major U.S. cities and surrounding metropolitan areas in the Alltel national network — all without additional roaming or long-distance fees.



VIEW LARGER

Sign up today and receive

- Extensive coverage including major U.S. cities
- Free nationwide long distance
- Free roaming near major cities

Most Popular Features:

- Basic Voice Mail
- Caller ID
- 3-Way Calling
- No Answer Transfer
- Call Forwarding
- Call Waiting
- Pay-Per-Use Text Messaging (10¢ Outgoing or Incoming)

Plans	Included Anytime Minutes	Night and Weekend Minutes**	Mobile-to-Mobile Minutes***	Add'l Minute Rate		
\$39.99*	500	unlimited	unlimited	40¢		
\$49.99*	1000	unlimited	unlimited	40¢		
\$59.99	900	unlimited	unlimited	40¢	✓	
\$79.99	1400	unlimited	unlimited	35¢	✓	
\$99.99	2100	unlimited	unlimited	25¢	✓	
\$149.99	4000	unlimited	unlimited	25¢	✓	
\$199.99	6000	unlimited	unlimited	25¢	✓	

*A \$25 non-refundable activation fee will apply. The Alltel National Freedom Network covers most U.S. cities. National Freedom customers calling Puerto Rico coverage area may be subject to long-distance charges. Coverage may not be available in all areas. > MORE

**Night minutes are Mon. - Thurs. 9 p.m. - 5:59 a.m. Weekend minutes are Fri. 9 p.m. - Mon 5:59 a.m. Minutes must be used each month and do not carry over.

***Mobile-to-Mobile minutes apply to calls made to and from Alltel wireless customers that originate and terminate within the National Freedom



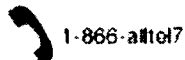
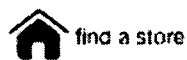
PERSONAL



Shop Online | Personal | Business | Corporate
Customer Service | Store Locator | Español

Home | Personal | Wireless | Plans | Family Plans

3WAYS TO
BUY



<< BACK TO PLANS

Family Plans

National Freedom | Greater Freedom | Smart Choice Packs | My Circle Family Choice Plans

National Freedom from Alltel offers extensive coverage at great rates. With this flexible plan, you're free to make calls to major U.S. cities and surrounding metropolitan areas in the Alltel national network — all without additional roaming or long-distance fees. Plus, connect your family coast to coast with the Family Choice Plan. Select a National Freedom plan below and then add up to 4 family lines for \$20 each.



VIEW LARGER

Sign up today and receive

- Extensive coverage including major U.S. cities
- Free nationwide long distance
- Free roaming near major cities

Most Popular Features:

- Basic Voice Mail
- Caller ID
- 3-Way Calling
- No Answer Transfer
- Call Forwarding
- Call Waiting
- Pay-Per-Use Text Messaging (10¢ Outgoing or Incoming)

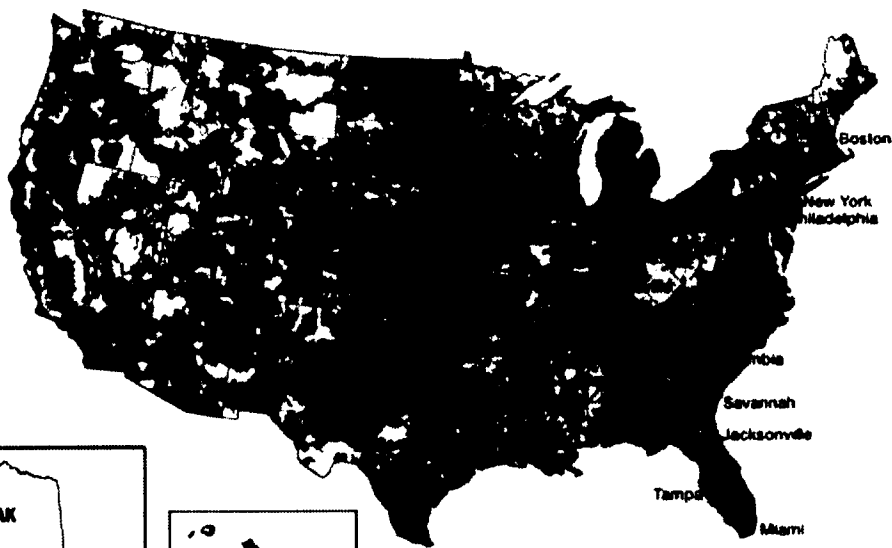
Plans	Included Anytime Minutes	Night and Weekend Minutes**	Mobile-to-Mobile Minutes***	Add'l Minute Rate		
\$59.99	900	unlimited	unlimited	40¢	✓	
\$79.99	1400	unlimited	unlimited	35¢	✓	
\$99.99	2100	unlimited	unlimited	25¢	✓	
\$149.99	4000	unlimited	unlimited	25¢	✓	
\$199.99	6000	unlimited	unlimited	25¢	✓	

*A \$25 non-refundable activation fee will apply. The Alltel National Freedom Network covers most U.S. cities. National Freedom customers calling Puerto Rico coverage area may be subject to long-distance charges. Coverage may not be available in all areas. > MORE

**Night minutes are Mon. - Thurs. 9 p.m. - 5:59 a.m. Weekend minutes are Fri. 9 p.m. - Mon 5:59 a.m. Minutes must be used each month and do not carry over.

***Mobile-to-Mobile minutes apply to calls made to and from Alltel wireless customers that originate and terminate within the National Freedom network coverage area. Call forwarding, 411 and Voice Mail calls excluded.

One-year and two-year service agreements available.



Boston

New York
Philadelphia

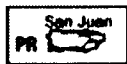
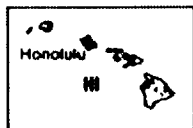
Omaha

Savannah

Jacksonville

Tampa

Miami





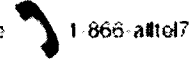
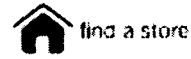
PERSONAL



Shop Online | Personal | Business | Corporate
Customer Service | Store Locator | Español

Home | Personal | Wireless | Plans | Individual Plans

3WAYS TO
BUY



<< BACK TO PLANS

Individual Plans

National Freedom

Greater Freedom

North American Freedom

Smart Choice Packs

The Greater Freedom wireless plan from Alltel is the best value for those who keep calls local. You'll receive great coverage in your large local area and when you need to call outside your network, extended coverage is at your fingertips.

VIEW YOUR COVERAGE

Enter ZIP Code > GO

Sign up today and receive

- Large local coverage area
- Best value for local callers
- Free nationwide long distance*

Plan* features include

- Basic Voice Mail
- Caller ID
- 3-Way Calling
- No Answer Transfer
- Call Forwarding
- Call Waiting
- Pay-Per-Use Text Messaging (10¢ Outgoing or Incoming)

*Included on plans \$39.99 and higher.

Plans	Included Anytime Minutes	Night and Weekend Minutes**	Mobile-to-Mobile Minutes***	Add'l Minute Rate		
\$29.99	300	—	—	45¢		
\$39.99	700	unlimited	unlimited	40¢		
\$49.99	1500	—	—	40¢		
\$59.99	1200	unlimited	unlimited	40¢	✓	
\$79.99	1600	unlimited	unlimited	35¢	✓	
\$99.99	2200	unlimited	unlimited	25¢	✓	
\$149.99	4500	unlimited	unlimited	25¢	✓	
\$199.99	6500	unlimited	unlimited	25¢	✓	

Calls originating and terminating within the local coverage area use plan minutes and are toll free. On the \$29.99 plan, calls placed while in the local coverage area and terminating to anywhere outside the local coverage area will be charged 15¢ per minute long distance. Some areas may offer options for toll-free calling to the U.S. Customers utilizing one of these options may not pay long-distance charges, but will still continue to use rate plan minutes. Airtime charges may apply if rate plan minutes are unavailable. A \$25 non-refundable activation fee will apply.



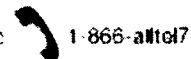
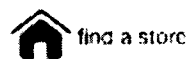
PERSONAL



Shop Online | Personal | Business | Corporate
Customer Service | Store Locator | Español

Home | Personal | Wireless | Plans | Family Plans

3 WAYS TO
BUY



<< BACK TO PLANS

Family Plans

National Freedom **Greater Freedom** Smart Choice Packs My Circle Family Choice Plans

The Greater Freedom wireless plan from Alltel is the best value for those who keep calls local. You'll receive great coverage in your large local area and when you need to call outside your network, extended coverage is at your fingertips. Select a Greater Freedom plan below and then add up to 4 family lines for \$20 each.

VIEW YOUR COVERAGE

Enter ZIP Code > GO

Sign up today and receive

- Large local coverage area
- Best value for local callers
- Free nationwide long distance*

Plan* features include

- Basic Voice Mail
- Caller ID
- 3-Way Calling
- No Answer Transfer
- Call Forwarding
- Call Waiting
- Pay-Per-Use Text Messaging (10¢ Outgoing or Incoming)

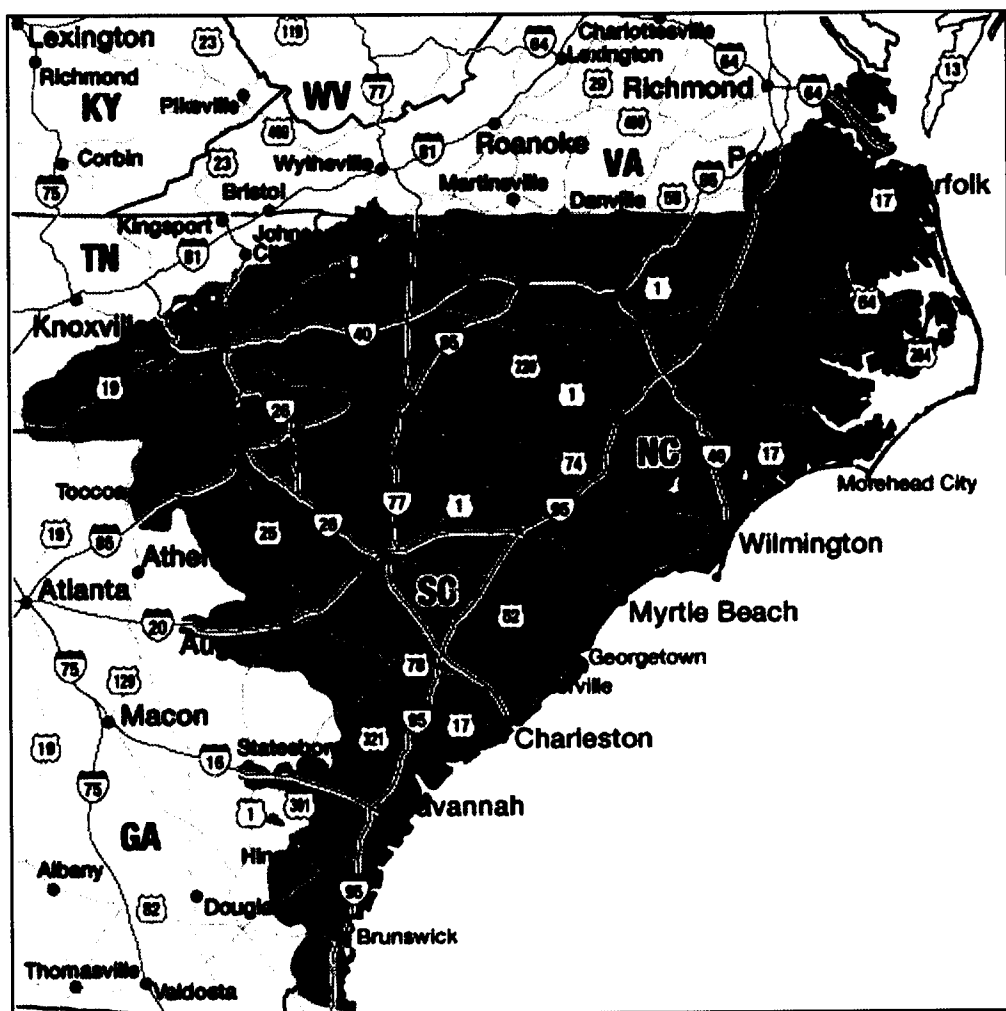
*Included on plans \$39.99 and higher.

Plans	Included Anytime Minutes	Night and Weekend Minutes**	Mobile-to-Mobile Minutes***	Add'l Minute Rate		
\$59.99	1200	unlimited	unlimited	40¢	✓	
\$79.99	1600	unlimited	unlimited	35¢	✓	
\$99.99	2200	unlimited	unlimited	25¢	✓	
\$149.99	4500	unlimited	unlimited	25¢	✓	
\$199.99	6500	unlimited	unlimited	25¢	✓	

Calls originating and terminating within the local coverage area use plan minutes and are toll free. On the \$29.99 plan, calls placed while in the local coverage area and terminating to anywhere outside the local coverage area will be charged 15¢ per minute long distance. Some areas may offer options for toll-free calling to the U.S. Customers utilizing one of these options may not pay long-distance charges, but will still continue to use rate plan minutes. Airtime charges may apply if rate plan minutes are unavailable. A \$25 non-refundable activation fee will apply.

Maps are general representation of coverage. Coverage varies based on system buildout, system availability and capacity, customer's equipment, terrain, signal strength, weather and other conditions.

**Night minutes are Mon. — Thurs. 9 p.m. — 5:59 a.m. Weekend minutes are Fri. 9 p.m. — Mon. 5:59 a.m. Minutes must be used each month and





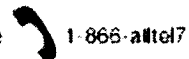
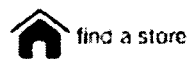
PERSONAL



Shop Online | Personal | Business | Corporate
Customer Service | Store Locator | Español

Home | Personal | Wireless | Plans | Individual Plans

3 WAYS TO
BUY



<< BACK TO PLANS

Individual Plans

National Freedom | Greater Freedom | North American Freedom | **Smart Choice Packs**

Keep your smart device working harder with voice and data solutions. Get national voice minutes with an unlimited data plan and your favorite features - all for one low monthly price.









VIEW LARGER

Unlimited Data Choices:

- BlackBerry® Internet or Enterprise Service
- Office Sync
- Axxess Broadband/MobileLink

Most Popular Features:

- My Circle
- Unlimited Text Messaging
- Unlimited Mobile-to-Mobile
- Unlimited Night and Weekend Minutes starting at 7 p.m.
- Basic voice mail

Plans	Included Anytime Minutes	Night and Weekend Minutes	Mobile-to-Mobile Minutes	Add'l Minute Rate		
\$69.99*	500	unlimited	unlimited	40¢		
\$89.99	500	unlimited	unlimited	40¢	✓	
\$109.99	1200	unlimited	unlimited	35¢	✓	
\$139.99	2000	unlimited	unlimited	25¢	✓	
\$189.99	5500	unlimited	unlimited	25¢	✓	

*Plan does not include My Circle, Unlimited Messaging and Nights starting at 7 p.m.

Smart Choice Pack Terms & Conditions

Explanation of Fees & Services



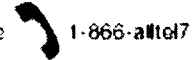
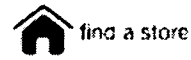
PERSONAL



Shop Online | Personal | Business | Corporate
Customer Service | Store Locator | Español

Home | Personal | Wireless | Plans | Family Plans

3 WAYS TO
BUY



<< BACK TO PLANS

Family Plans

National Freedom | Greater Freedom | **Smart Choice Packs** | My Circle Family Choice Plans

Share your voice minutes and features when you add family lines to your Smart Choice Pack. Select your individual plan with unlimited data then add up to 4 family lines for \$20 each. *



VIEW LARGER

Most Popular Features:

- My Circle
- Unlimited Text Messaging
- Unlimited Mobile-to-Mobile
- Unlimited Night and Weekend Minutes starting at 7 p.m.
- Basic voice mail

Plans	Included Anytime Minutes	Night and Weekend Minutes	Mobile-to-Mobile Minutes	Add'l Minute Rate		
\$69.99**	500	unlimited	unlimited	40¢		
\$89.99	500	unlimited	unlimited	40¢	✓	
\$109.99	1200	unlimited	unlimited	35¢	✓	
\$139.99	2000	unlimited	unlimited	25¢	✓	
\$189.99	5500	unlimited	unlimited	25¢	✓	

*Additional smart devices do not qualify as family plans. > MORE

**Plan does not include My Circle, Unlimited Messaging and Nights starting at 7 p.m.

[Smart Choice Pack Terms & Conditions](#)

[Explanation of Fees & Services](#)



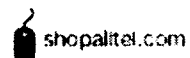
PERSONAL



Shop Online | Personal | Business | Corporate
Customer Service | Store Locator | Español

Home | Personal | Wireless | Plans | Individual Plans

3WAYS TO
BUY



find a store



1-866-alltel7

<< BACK TO PLANS

Individual Plans

National Freedom | Greater Freedom | **North American Freedom** | Smart Choice Packs

North American FreedomSM provides additional value for traveling to or calling other countries within North America. In addition to National Freedom coverage at home, the plans also include no roaming for package and off-peak minutes in Canada, Mexico, Puerto Rico, and the U.S. Virgin Islands. You can also call from the U.S. to those countries toll-free! You also get unlimited Mobile-to-Mobile and My Circle calling from the U.S. coverage area.



VIEW LARGER

Included Features*:

- Caller ID
- Pay-Per-Use Messaging
- Basic Voice Mail
- Three-Way Calling
- No Answer Transfer
- Call Forwarding
- Call Waiting

Most Popular Features:

- Toll-free calling from the U.S. coverage area to the United States, Canada, Mexico, Puerto Rico and the U.S. Virgin Islands
- Toll-free calling from any covered area (including green areas on the map) back to the United States
- Off-peak minutes apply throughout the entire North American Freedom Coverage Area (including green and dark blue areas)

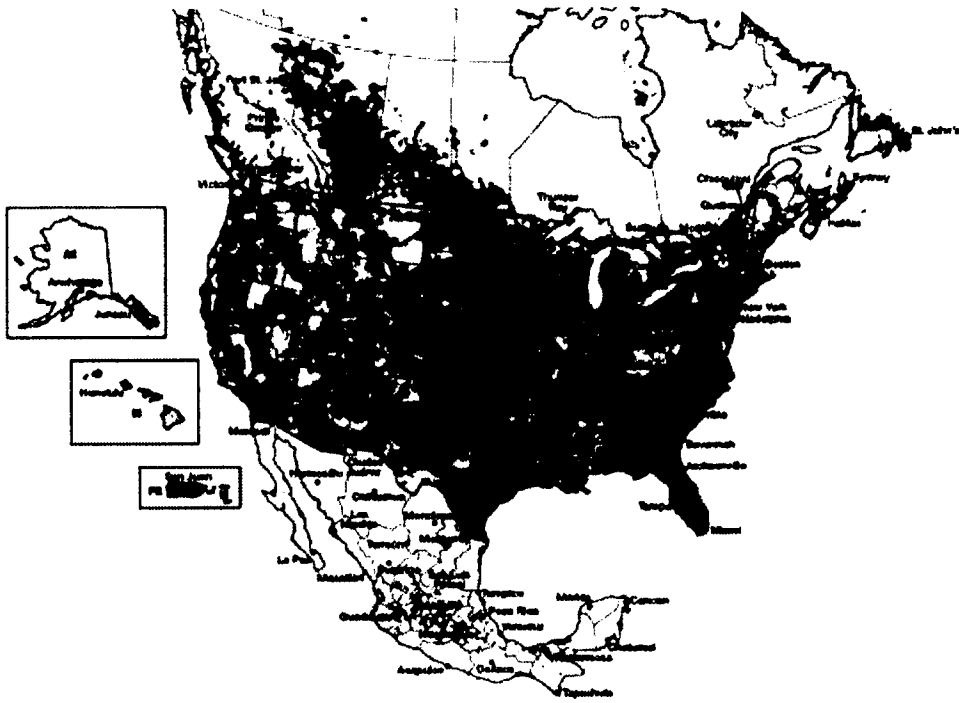
Plans**	Included Anytime Minutes	Add'l Minute Rate	Night and Weekend Minutes	Mobile-to-Mobile Minutes	
\$59.99	450	45¢	1,000 North American	Unlimited U.S. Only (NF)	
\$79.99	900	40¢	1,000 North American	Unlimited U.S. Only (NF)	
\$99.99	1350	35¢	1,000 North American	Unlimited U.S. Only (NF)	
\$149.99	2500	25¢	1,000 North American	Unlimited U.S. Only (NF)	

*All features may not be available in all areas.

**North American Freedom plans are network-based in the U.S. and not geography-based. You will need to watch your phone's roaming indicator while in the U.S. to determine whether or not the minutes you are using are included in the plan. Click here for more information on roaming indicators. Coverage may not be available in all areas. Customers should dial *228 prior to leaving the country to ensure that the phone has the most current software in order to maximize coverage. Coverage in Mexico may be more thorough than it appears. For additional information, visit alltel.com/MXcitylist for a list of over 800 Mexican cities where coverage is available. Extended Night Minutes (\$7 for 7PM) is not available on North American Freedom. BlackBerry and PDA/Smartphones are currently not eligible for North American Freedom plans.

North America Freedom Terms & Conditions

Explanation of Fees & Services





PERSONAL

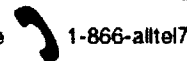
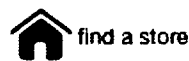


Shop Online | Personal | Business | Corporate
Customer Service | Store Locator | Español

Home | Personal | Wireless | Plans | Family Plans

<< BACK TO PLANS

3 WAYS TO
BUY



Family Plans

National Freedom

Greater Freedom

Smart Choice Packs

My Circle Family Choice Plans

family plans

phones

my
circle
family choice plan

buy one plan
get one plan
FREE

the best deal in wireless

*Additional Charges Apply

choose any ten numbers on any network to call for free

choose your bonus feature or
1000 text or video messages **OR** 1000 minutes starting at 700 per

plus, unlimited mobile-to-mobile and unlimited nights
and weekends

choose your plan

\$79⁹⁹
mo

OR

\$109⁹⁹
mo



*Offer Conditions



What's Not to Love? We're all about what we can do for you!



Home | All4You

america's
largest
network

so reliable, you stay connected
or we pay you back.™

You stay connected or we pay you back.

At Alltel, we strive to make sure every call stays connected. That's why you'll get an automatic one-minute credit for any call dropped on the Alltel network. You don't even have to call us. That's how confident we are in the Alltel network. Designed to give you the best call quality possible, it's a network you can count on. Just look for the credit on your bill.

my
circle

choose who you call for free —
any number, any network

Choose who you call for free — any number, any network.

Your Circle isn't about millions of people you don't know, it's about keeping in touch with the people who matter most. With My Circle, exclusively from Alltel, you choose who you call for free—any number, any network.

Just pick ten wireless, home or office numbers — anywhere in the U.S. and you'll get unlimited calls to and from your Circle members for free on select plans. >MORE

anytime
plan
changes™

change your rate plan whenever you
need without extending your contract

It's all about flexibility.

Think you should be able to change plans when you need to? We couldn't agree more.

We understand that sometimes you just need to make a change. You're using more minutes than you thought would. You've gotten married. You've changed jobs. Whatever the reason, you won't have to extend your contract. Just let us know. It's that easy. We just want what's best for you.

Does not apply to certain business accounts. Plan changes may not become effective until beginning of your next billing cycle.

Largest Network Claim: Based upon analysis by an independent research company in July 2006, which compared marketed coverage patterns at the time their creation of each wireless carrier without allowance for variations due to electrical interference, customer equipment, topography & each carrier's translation & defined preferences of their own internal engineering data. **Stay Connected:** An automatic one-minute credit will be provided for any dropped voice call on the Alltel network. Not available on prepaid plans. No action is required by the customer to receive the credit. Total dropped calls will be reflected on the current month's billing statement. Dropped calls will not be credited when outside the Alltel network. Program may be discontinued at the discretion of Alltel. **My Circle:** Available to new and existing customers on current select rate plans \$59.99/mo & higher. My Circle applies to ten numbers per account, which must be shared among all lines on account. Not available on prepaid plans. Customer may not designate own wireless or voice mail number, Direct Connect or 900 numbers as any of the ten available numbers. Calls must begin & end in your plan's calling area. Designated numbers must be within the U.S. Program may be discontinued at the discretion of Alltel. **Anytime Plan Changes:** Does not apply to certain business accounts. Plan changes may not become effective until beginning of your next billing cycle.

let's talk about



pay-per-minute

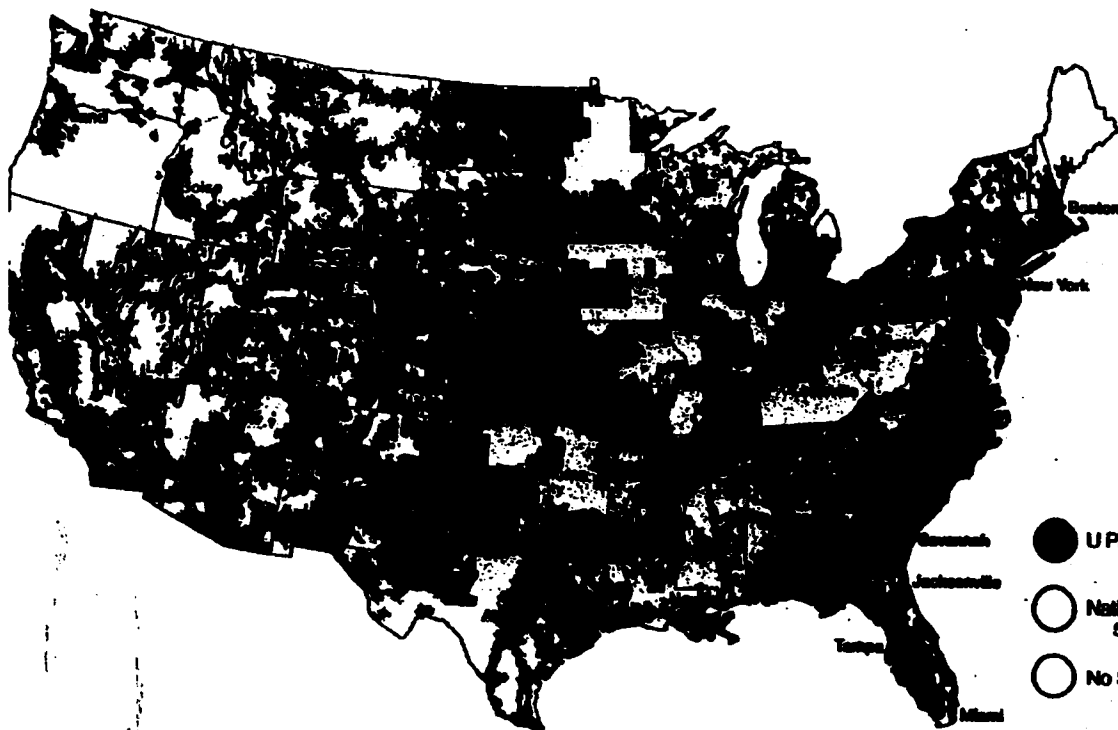
It's the wireless prepaid plan that puts U in charge. Tailor your service and payment plan to your exact personality — contract free. By the minute, the day or the month, Alltel delivers it your way.

- It's flexible — U choose your plan
- No annual contract or credit check
- Easy payment options — your turf, your terms
- No billing surprises

Keep it simple. Just pay for the minutes U use.

15* a minute all the time

Text messaging 5* a Message In/Out



America's largest wireless network — covering more of the country than any other company.

Map is a general representation of coverage. It is for illustrative purposes only. Wireless service is subject to limitations and may vary based on system availability and capacity, customer's equipment, terrain, signal strength, buildings, weather and other conditions. Service outside of the Alltel Wireless Network, although depicted on our maps, is based on information from other carriers or publicly available information, and we cannot guarantee its accuracy. Alltel does not guarantee coverage of service outside of its network.

access™ text messaging

Send and receive text messages for one low price.

300 messages \$5.99/mo.

750 messages \$9.99/mo.

There is a 5¢ charge for every incoming/outgoing message over package plan.



pay-per-day

The power is yours. Pick the features U want.

75¢ a day gets you 10¢ a minute anytime
Plus U choose two of the following **FREE** features:

- Unlimited Mobile-to-Mobile
- Unlimited Night and Weekend Minutes
- Unlimited Calls to Your Favorite Number
- Unlimited Text Messaging

Add additional features from above list
for 25¢ a day.

If Unlimited feature is not chosen, the following
fees apply:

- | | |
|---------------------------------|---------------------|
| • Mobile-to-Mobile | 10¢ a Minute |
| • Nights and Weekends | 10¢ a Minute |
| • Calls to Your Favorite Number | 10¢ a Minute |
| • Text Messaging | 5¢ a Message In/Out |

build a plan that's right for U.



pay-per-month

Have it all. Monthly plans are ready to work for U.

\$29.99 a month

- 200 Anytime Minutes
- 1000 Night and Weekend Minutes
- Text Messaging 5¢ a Message In/Out
- Additional Minutes 35¢ Each

\$39.99 a month

- 400 Anytime Minutes
- 2000 Night and Weekend Minutes
- Text Messaging 5¢ a Message In/Out
- Additional Minutes 35¢ Each

\$69.99 a month

- 700 Anytime Minutes
- Unlimited Night and Weekend Minutes
- Unlimited Text Messaging
- Unlimited Mobile-to-Mobile
- Additional Minutes 10¢ Each

Add

- Unlimited Calls to Your Favorite Number
\$5 a Month



stuff U should know

- All U plans include free: Nationwide Long Distance on calls originating from the Alltel Wireless Network, Voice Mail, Caller ID, Call Waiting and Three-Way Calling. You have the ability to call Mexico, Canada or Puerto Rico (per-minute rate varies).
- For voice mail instructions, visit alltel.com
- To check your account balance, dial *361 a free call from your wireless phone.
- There are no roaming fees for calls made within the Alltel coverage network. If you roam off the Alltel network, your roaming rate is 59¢/minute.
- Directory Assistance is \$1.25 per call.

she brendalized her wireless.



E911 Service

Enhanced 911 (E911) service allows 911 dispatchers to receive a wireless caller's phone number and location when calling for help. Where available, this service helps improve response times during an emergency.*

In order for 911 operators to see your location, a caller must have adequate signal and battery strength, as well as a GPS-equipped phone.

Helping to ensure the safety of our customers is important to us. That's why Alltel now only activates GPS-equipped phones.

To determine if your phone is GPS-equipped:

- Refer to your owner's manual.
- Visit alltelstepbystep.com.
- Ask an Alltel representative for assistance.

If your phone isn't GPS-equipped, ask an Alltel representative for more information.

*Wireless E911 service that provides location capability may not be available in all areas. To find out if it is available in your country, visit the National Emergency Number Association's Web site at www.nena.org. Click on Wireless, then Wireless Deployment Profile.



alltel
wireless

Get the whole
family talking.

Add lines

\$9.99*
EACH
LIMITED TIME
*On plans \$59.99 and higher.

Add up to
4 lines!

alltel
wireless

*\$9.99 Add a Line: 1 line must be a primary line of service on select rate plans \$59.99 and higher, with no more than 4 secondary lines at \$9.99/month. Service agreement required for each line. 1-year service agreement required for each new line; 2-year service agreement required in conjunction with a phone promotion. Additional information: Limited-time offer at participating locations. Subject to the Alltel Terms & Conditions for Communications Services available at alltel.com. ©2005 Alltel Communications, Inc.

A-ADDALINE 9.99 05/05

Axcess TV Available Channels



Subject to change without notice. All product & service marks referenced are the names, trade names, trademarks & logos of their respective owners.



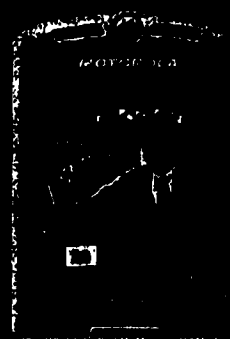
1-800-alltel-1 (1-800-255-8351)

alltel.com

A-AXCRADTV4X9 04/08



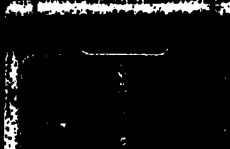
Turn the TV Live & Local Connections



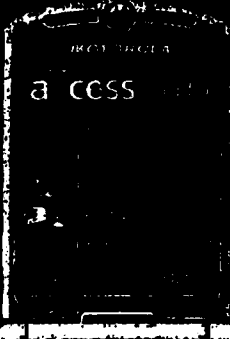
a cess tv

With Axcess TV, you can watch live & local TV channels on your Axcess TV set. You can also watch live & local TV channels on your Axcess TV set. You can also watch live & local TV channels on your Axcess TV set.

\$9.99



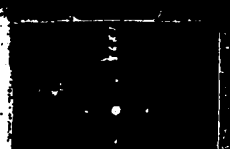
Download the Axcess TV app to your phone. Available on any Android phone. Visit alltel.com/axcess for more details.



a cess radio

With Axcess TV, you can watch live & local TV channels on your Axcess TV set. You can also watch live & local TV channels on your Axcess TV set. You can also watch live & local TV channels on your Axcess TV set.

\$6.99



E-911

Your wireless phone is great to have in an emergency. However, calling 9-1-1 from your wireless phone is dependent upon adequate signal and battery strength in order to operate properly. If you are in an area where you can't receive a signal or if the battery is low, you won't be able to make any calls, including 9-1-1. However, with adequate signal strength, a wireless phone can dial 9-1-1 even if you have disconnected your service.

Another difference when using a wireless phone is that, depending on the public safety services available in your area, 9-1-1 operators may or may not be able to view your call back number or know your location. The ability of public safety entities to collect this information from your call is known as Enhanced 9-1-1 (E9-1-1) and is separated into two phases.

Wireless E9-1-1: Phase I (Call Back) vs. Phase II (Location) When Phase 1 service is implemented by a public safety entity, your wireless phone number is displayed to 9-1-1 operators when the call is connected as well as the address of the tower serving your call. Should the call be disconnected, the operator would still have your call back number.

Phase II service generally provides upgraded emergency call centers with your location when you make a call. This phase is a joint venture between the public safety entity and the wireless carrier. Both play a role in providing the service, and it is up to the public safety entity in the area to initiate the request. On Alltel's network, callers must have a GPS-capable phone in order for 9-1-1 operators to locate them.

Do you have a GPS-capable phone? To determine if your phone is GPS capable, look in your owner's manual or on your phone screen. In many cases, an icon such as a compass is displayed. If you do not have your owner's manual, most are available online at alltel.com—just click on "Step by Step Instructions." You may also bring your phone to an Alltel store or Authorized Agent for a free phone checkup to assess whether it is GPS capable and to learn more about upgrading your phone if it does not have this capability.

To comply with FCC mandates, Alltel only activates GPS-capable phones on our network and only sells phones that are GPS-capable.

It is important to note that a GPS-capable phone is only one part of the ability to locate a caller. The public safety entity in your area also must request and deploy Phase II technology with your wireless carrier. This life-saving technology is not yet available everywhere, although additional efforts are ongoing.

Want more E9-1-1 information? To find out more about all E9-1-1 deployment by county, simply go to the National Emergency Number Association's Web site at www.nena.org—click on "Wireless" then "Wireless Deployment Profile." This information is not specific to one wireless carrier. For more information about our latest selection of phones, please visit an Alltel location or Authorized Agent.



**We're Here
To Help
Contact Us**

Customer Number & Call Record Privacy

Alltel strictly maintains customers' wireless phone number and call record privacy. It is company policy not to sell or release wireless phone numbers and/or call records to outside parties. Some customers may have recently seen news reports suggesting some wireless carriers sell or release their customers' wireless phone numbers or call records. This is generating customer questions about Alltel's policies.

Again, Alltel's company policy maintains customers' privacy and does not sell or release wireless phone numbers or call records. Alltel has a long history of protecting customer privacy and the company has many security measures in place to protect customers' records. Customer privacy is paramount and Alltel will make sure that it secures private customer information and does not share it with outside parties.



**We're Here
To Help
Contact Us**

Wireless Safety on the Road

With so many people on the roads today, wireless phone safety is essential. In fact, it can save lives. Help make our roads safer by following these safe-driving tips from the Wireless Foundation.

1. Use speed dial and redial.

Carefully read your phone's instruction manual to learn to use quick-dial features such as automatic redial and memory. Plus, if you memorize your phone's keypad, you'll be able to use the speed dial function without taking your eyes off the road.

2. Use a hands-free device.

A number of hands-free phone accessories are available today, including headsets, mounted devices and speakerphone accessories.

3. Keep your wireless phone within reach.

Be sure to place your wireless phone close enough so that you can grab it without removing your eyes from the road. If your phone rings at an inconvenient time, let your voice mail pick up the call.

4. Don't use your phone during hazardous driving conditions or situations.

Let the person you're speaking with know you're driving so you can suspend the call in hazardous situations. Rain, sleet, snow and ice can be dangerous, but so can heavy traffic. As a driver, your first responsibility is to pay attention to the road.

5. Don't take notes or look up phone numbers while driving.

Don't get caught in a dangerous situation just because you're not paying attention to the road. If you're reading an address book or business card, or writing a to-do list while driving a car, you're not watching where you're going.

6. Dial sensibly and assess the traffic.

If possible, place calls when you're not moving or before pulling into traffic. Try to plan your calls before you begin your trip or make them when you're stopped. If you need to dial while driving, dial a few numbers, check the road and your mirrors, then continue dialing.

7. Don't engage in stressful or emotional conversations.

Stressful or emotional conversations are distracting and even dangerous when you're behind the wheel of a car. Let those you're talking with know you're driving and, if necessary, suspend conversations that could potentially divert your attention from the road.

8. Use your wireless phone to call for help.

Your wireless phone can help you protect yourself and your family in dangerous situations. With your phone at your side, help is only three free numbers away. Dial 9-1-1 or another local emergency number in the case of fire, accident, road hazard or medical emergency.

9. Use your wireless phone to help others in emergencies.

Your wireless phone affords you the perfect opportunity to be a "Good Samaritan" in your community. If you see an auto accident, a crime in progress or a serious emergency, call 9-1-1 or another local emergency number.

10. Call roadside assistance or a wireless non-emergency number.

Certain driving situations require attention, but aren't urgent enough to merit a call for emergency services. In these cases, you can still use your wireless phone to lend a hand. Just call roadside assistance or another special non-emergency number.



**We're Here
To Help
Contact Us**

Mr. Rescue®

Select an Add-on

 PRINT

For \$3 per month, Mr. Rescue — our Emergency Roadside Assistance program — gives you peace of mind by providing free towing service (up to \$50), flat tire assistance, lock out assistance and more. Simply use your wireless phone for immediate contact with fast, reliable, qualified dispatch service for all roadside emergencies, 24 hours a day, 365 days a year.

Sign up today and receive

- 24-Hour roadside assistance
- Free towing service (up to \$50)

You can add this option when you purchase a phone and plan online.

 [START SHOPPING](#)

3 Ways to Buy Now

- Shop Online
- Find a store
- Call 1-866-also7



First Month Free
Try Mr. Rescue FREE
for one month
[> MORE](#)



Touch2Talk
Just touch a button
then talk!
[> MORE](#)




EXHIBIT C

Alltel Communications, Inc.
State of South Carolina
Non-Rural Telephone Company Wire Centers
Where ETC Designation is Sought

SAC	LEC NAME	WIRE CENTER	CLLI	COUNTY	# ON MAP
240479	VERIZON SOUTH INC.-SC	ABBEVILLE	ABVLSCXA	Abbeville	1
240479	VERIZON SOUTH INC.-SC	ANDREWS	ANDRSCXA	Georgetown	2
240479	VERIZON SOUTH INC.-SC	BISHOPVILLE	BSVLSCXA	Lee	3
240479	VERIZON SOUTH INC.-SC	CALHOUN FLS	CLFLSCXA	Abbeville	4
240479	VERIZON SOUTH INC.-SC	CONWAY	CNWYSCXA	Horry	5
240479	VERIZON SOUTH INC.-SC	EHRHARDT	EHRHSCXA	Bamberg	6
240479	VERIZON SOUTH INC.-SC	FAIRFAX	FRFXSCXA	Allendale	7
240479	VERIZON SOUTH INC.-SC	GEORGETOWN	GRTWSCXA	Georgetown	8
240479	VERIZON SOUTH INC.-SC	HOLLYWOOD	HLWDSCXA	Charleston	9
240479	VERIZON SOUTH INC.-SC	HEMINGWAY	HMNGSCXA	Williamsburg	10
240479	VERIZON SOUTH INC.-SC	JOHNSONVILLE	JSVLSCXA	Florence	11
240479	VERIZON SOUTH INC.-SC	KINGSTREE	KGTRSCXA	Williamsburg	12
240479	VERIZON SOUTH INC.-SC	LAMAR	LAMRSCXA	Darlington	13
240479	VERIZON SOUTH INC.-SC	LK CITY	LKCYSCXA	Florence	14
240479	VERIZON SOUTH INC.-SC	LAURENS	LRNSSCXC	Laurens	15
240479	VERIZON SOUTH INC.-SC	MC CORMICK	MCCRSCXB	McCormick	16
240479	VERIZON SOUTH INC.-SC	MANNING	MNNGSCXA	Clarendon	17
240479	VERIZON SOUTH INC.-SC	MYRTLE BCH	MYBHSCXB	Horry	18
240479	VERIZON SOUTH INC.-SC	MYRTLE BEACH	MYBHSCXC	Horry	19
240479	VERIZON SOUTH INC.-SC	MYRTLE BCH	MYBHSCXM	Horry	20
240479	VERIZON SOUTH INC.-SC	N MYRTLE BCH	ODBHSCXB	Horry	21
240479	VERIZON SOUTH INC.-SC	OLAR	OLARSCXA	Bamberg	22
240479	VERIZON SOUTH INC.-SC	OLANTA	OLNTSCXA	Florence	23
240479	VERIZON SOUTH INC.-SC	PAMPLICO	PMPLSCXA	Florence	24
240479	VERIZON SOUTH INC.-SC	PAWLEYS IS	PWISSCXA	Georgetown	25
240479	VERIZON SOUTH INC.-SC	SHAW A F B	SHHGSCXB	Sumter	26
240479	VERIZON SOUTH INC.-SC	SUMMERTON	SMTNSCXA	Clarendon	27
240479	VERIZON SOUTH INC.-SC	SUMTER	SMTRSCXA	Sumter	28
240479	VERIZON SOUTH INC.-SC	WOODRUFF	WDRFSCXA	Spartanburg	29
240479	VERIZON SOUTH INC.-SC	WALTERBORO	WLBOSCXC	Colleton	30
240479	VERIZON SOUTH INC.-SC	WINNSBORO	WNBOSCXA	Fairfield	31
240479	VERIZON SOUTH INC.-SC	N MYRTLE BCH	WNHLSCXA	Horry	32
240479	VERIZON SOUTH INC.-SC	YEMASSEE	YMSSSCXA	Hampton	33
245194	SOUTHERN BELL - SC (BELLSOUTH)	AIKEN	AIKNSCMA	Aiken	34
245194	SOUTHERN BELL - SC (BELLSOUTH)	ALLENDAL	ALDLSCMA	Allendale	35
245194	SOUTHERN BELL - SC (BELLSOUTH)	PENDLETON	ARSNSCAH	Anderson	36
245194	SOUTHERN BELL - SC (BELLSOUTH)	ANDERSON	ARSNSCMA	Anderson	37
245194	SOUTHERN BELL - SC (BELLSOUTH)	TOWNVILLE	ARSNSCTV	Anderson	38
245194	SOUTHERN BELL - SC (BELLSOUTH)	WARRENVILLE	BATHSCMA	Aiken	39
245194	SOUTHERN BELL - SC (BELLSOUTH)	BLACKVILLE	BAVLSCMA	Barnwell	40
245194	SOUTHERN BELL - SC (BELLSOUTH)	BELTON	BETNSCMA	Anderson	41
245194	SOUTHERN BELL - SC (BELLSOUTH)	BENNETTSVILLE	BEVLSCMA	Marlboro	42
245194	SOUTHERN BELL - SC (BELLSOUTH)	BEECH IS	BHISSCMA	Aiken	43
245194	SOUTHERN BELL - SC (BELLSOUTH)	BLACKSBURG	BLBGSCMA	Cherokee	44
245194	SOUTHERN BELL - SC (BELLSOUTH)	BLenheim	BLNHSCMA	Marlboro	45
245194	SOUTHERN BELL - SC (BELLSOUTH)	BLUE RIDGE	BLRGSCMA	Greenville	46
245194	SOUTHERN BELL - SC (BELLSOUTH)	BAMBERG	BMBRSCMA	Bamberg	47
245194	SOUTHERN BELL - SC (BELLSOUTH)	BARNWELL	BRWLSCBE	Barnwell	48
245194	SOUTHERN BELL - SC (BELLSOUTH)	BATESBURG	BTBGSCMA	Lexington	49
245194	SOUTHERN BELL - SC (BELLSOUTH)	CENTRAL	CENTSCWS	Pickens	50
245194	SOUTHERN BELL - SC (BELLSOUTH)	CHAPIN	CHAPSCCL	Lexington	51
245194	SOUTHERN BELL - SC (BELLSOUTH)	CHERAW	CHRWSCES	Chesterfield	52
245194	SOUTHERN BELL - SC (BELLSOUTH)	CHARLESTON	CHTNSCDP	Berkeley	53

Alltel Communications, Inc.
State of South Carolina
Non-Rural Telephone Company Wire Centers
Where ETC Designation is Sought

SAC	LEC NAME	WIRE CENTER	CLLI	COUNTY	# ON MAP
245194	SOUTHERN BELL - SC (BELLSOUTH)	CHARLESTON	CHTNSCDT	Charleston	54
245194	SOUTHERN BELL - SC (BELLSOUTH)	CHARLESTON	CHTNSCJM	Charleston	55
245194	SOUTHERN BELL - SC (BELLSOUTH)	JOHNS IS	CHTNSCJN	Charleston	56
245194	SOUTHERN BELL - SC (BELLSOUTH)	CHARLESTON	CHTNSCLB	Charleston	57
245194	SOUTHERN BELL - SC (BELLSOUTH)	N CHARLESTON	CHTNSCNO	Charleston	58
245194	SOUTHERN BELL - SC (BELLSOUTH)	CHARLESTON	CHTNSCWA	Charleston	59
245194	SOUTHERN BELL - SC (BELLSOUTH)	CLIO	CLIOSCMA	Marlboro	60
245194	SOUTHERN BELL - SC (BELLSOUTH)	COLUMBIA	CLMASCAR	Richland	61
245194	SOUTHERN BELL - SC (BELLSOUTH)	COLUMBIA	CLMASCBQ	Richland	62
245194	SOUTHERN BELL - SC (BELLSOUTH)	COLUMBIA	CLMASCCH	Richland	63
245194	SOUTHERN BELL - SC (BELLSOUTH)	IRMO	CLMASCDF	Richland	64
245194	SOUTHERN BELL - SC (BELLSOUTH)	COLUMBIA	CLMASCPA	Richland	65
245194	SOUTHERN BELL - SC (BELLSOUTH)	COLUMBIA	CLMASCSA	Richland	66
245194	SOUTHERN BELL - SC (BELLSOUTH)	WEST COLUMBIA	CLMAS CSC	Lexington	67
245194	SOUTHERN BELL - SC (BELLSOUTH)	COLUMBIA	CLMASCSH	Richland	68
245194	SOUTHERN BELL - SC (BELLSOUTH)	COLUMBIA	CLMASCSN	Richland	69
245194	SOUTHERN BELL - SC (BELLSOUTH)	COLUMBIA	CLMASCSU	Richland	70
245194	SOUTHERN BELL - SC (BELLSOUTH)	CAYCE	CLMASCSW	Lexington	71
245194	SOUTHERN BELL - SC (BELLSOUTH)	CLEMSON	CLSNSCMA	Pickens	72
245194	SOUTHERN BELL - SC (BELLSOUTH)	CLINTON	CLTNSCMA	Laurens	73
245194	SOUTHERN BELL - SC (BELLSOUTH)	CLOVER	CLVRSCES	York	74
245194	SOUTHERN BELL - SC (BELLSOUTH)	LUGOFF	CMDNSCLG	Kershaw	75
245194	SOUTHERN BELL - SC (BELLSOUTH)	CAMDEN	CMDNSCMA	Kershaw	76
245194	SOUTHERN BELL - SC (BELLSOUTH)	COWPENS	CWPNSCMA	Spartanburg	77
245194	SOUTHERN BELL - SC (BELLSOUTH)	DILLON	DLLNSCMA	Dillon	78
245194	SOUTHERN BELL - SC (BELLSOUTH)	DENMARK	DNMKSCES	Bamberg	79
245194	SOUTHERN BELL - SC (BELLSOUTH)	DARLINGTON	DRTNSCMA	Darlington	80
245194	SOUTHERN BELL - SC (BELLSOUTH)	EDISTO BEACH	EDBHSCMA	Charleston	81
245194	SOUTHERN BELL - SC (BELLSOUTH)	EDGEFIELD	EDFDSCMA	Edgefield	82
245194	SOUTHERN BELL - SC (BELLSOUTH)	EASTOVER	EOVRSCMA	Richland	83
245194	SOUTHERN BELL - SC (BELLSOUTH)	EASLEY	ESLYSCMA	Pickens	84
245194	SOUTHERN BELL - SC (BELLSOUTH)	CHARLESTON	FLBHSCMA	Charleston	85
245194	SOUTHERN BELL - SC (BELLSOUTH)	FLORENCE	FLRNSCMA	Florence	86
245194	SOUTHERN BELL - SC (BELLSOUTH)	FOUNTAIN INN	FNINSCES	Greenville	87
245194	SOUTHERN BELL - SC (BELLSOUTH)	FINGERVILLE	FNVLSCMA	Spartanburg	88
245194	SOUTHERN BELL - SC (BELLSOUTH)	GAFFNEY	GFNYSCMA	Cherokee	89
245194	SOUTHERN BELL - SC (BELLSOUTH)	GRANITEVILLE	GIVLSCMA	Aiken	90
245194	SOUTHERN BELL - SC (BELLSOUTH)	GREENVILLE	GNVLSCBE	Greenville	91
245194	SOUTHERN BELL - SC (BELLSOUTH)	TAYLORS	GNVLSCCH	Greenville	92
245194	SOUTHERN BELL - SC (BELLSOUTH)	GREENVILLE	GNVLSCCR	Greenville	93
245194	SOUTHERN BELL - SC (BELLSOUTH)	GREENVILLE	GNVLSCDT	Greenville	94
245194	SOUTHERN BELL - SC (BELLSOUTH)	GREENVILLE	GNVLSCWE	Greenville	95
245194	SOUTHERN BELL - SC (BELLSOUTH)	GREENVILLE	GNVLSCWP	Greenville	96
245194	SOUTHERN BELL - SC (BELLSOUTH)	GREENVILLE	GNVLSCWR	Greenville	97
245194	SOUTHERN BELL - SC (BELLSOUTH)	GREER	GRERSCMA	Greenville	98
245194	SOUTHERN BELL - SC (BELLSOUTH)	HICKORY GROVE	HCGVSCMA	York	99
245194	SOUTHERN BELL - SC (BELLSOUTH)	HONEA PATH	HNPWSCMA	Anderson	100
245194	SOUTHERN BELL - SC (BELLSOUTH)	HARTSVILLE	HTVLSCMA	Darlington	101
245194	SOUTHERN BELL - SC (BELLSOUTH)	ISLE OF PALMS	ISPLSCIS	Charleston	102
245194	SOUTHERN BELL - SC (BELLSOUTH)	JOHNSTON	JHTNSCMA	Edgefield	103
245194	SOUTHERN BELL - SC (BELLSOUTH)	JONESVILLE	JNVLSCMA	Union	104
245194	SOUTHERN BELL - SC (BELLSOUTH)	JOANNA	JONNSCES	Laurens	105
245194	SOUTHERN BELL - SC (BELLSOUTH)	LATTA	LATTSCLS	Dillon	106

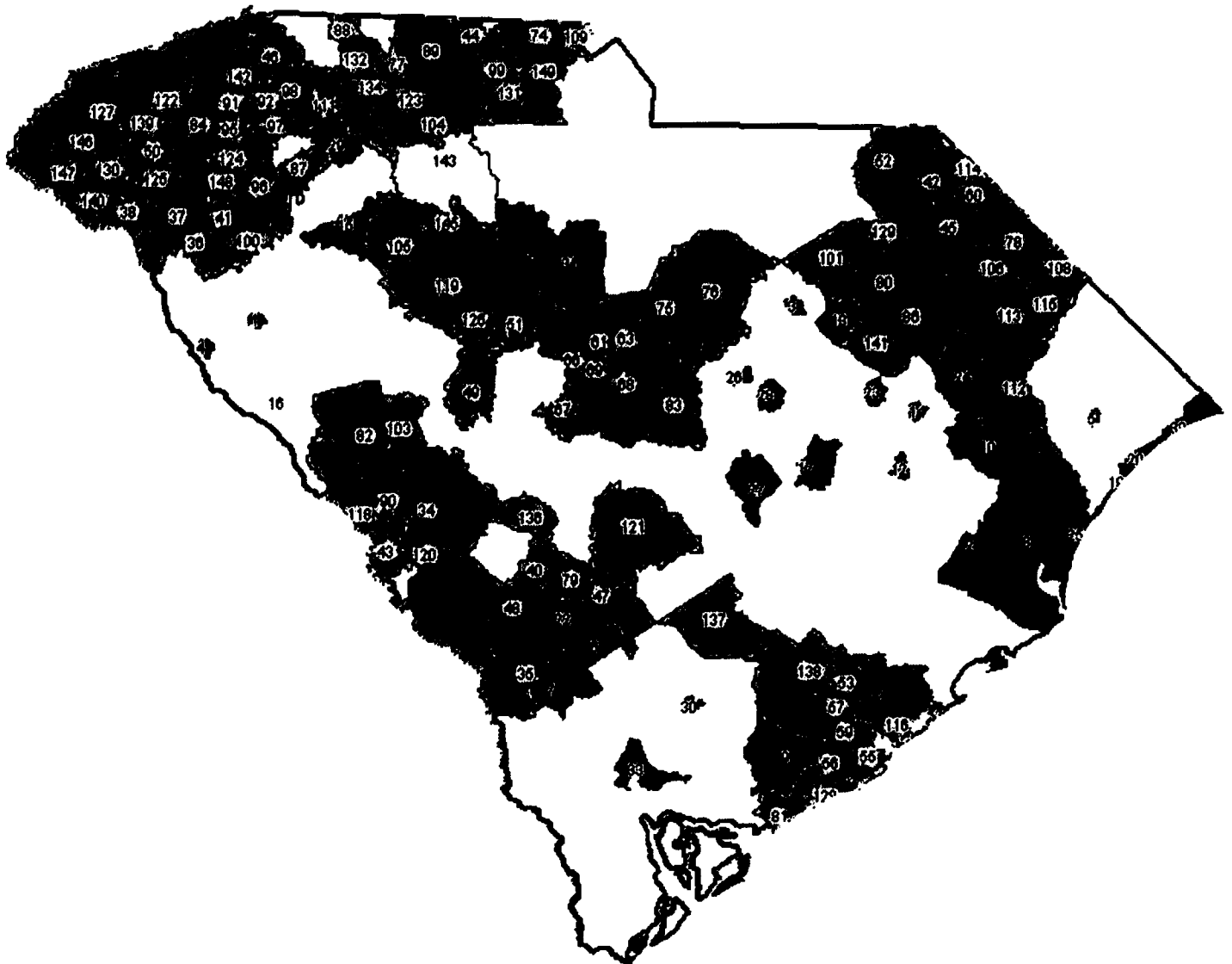
Alltel Communications, Inc.
State of South Carolina
Non-Rural Telephone Company Wire Centers
Where ETC Designation Is Sought

SAC	LEC NAME	WIRE CENTER	CLLI	COUNTY	# ON MAP
245194	SOUTHERN BELL - SC (BELLSOUTH)	LIBERTY	LBRTSCMA	Pickens	107
245194	SOUTHERN BELL - SC (BELLSOUTH)	LK VIEW	LKVVSCMA	Dillon	108
245194	SOUTHERN BELL - SC (BELLSOUTH)	CLOVER	LKWLSCRS	York	109
245194	SOUTHERN BELL - SC (BELLSOUTH)	LYMAN	LYMNSCES	Spartanburg	110
245194	SOUTHERN BELL - SC (BELLSOUTH)	DUNCAN	LYMNSCIP	Spartanburg	111
245194	SOUTHERN BELL - SC (BELLSOUTH)	BRITTONS NECK	MARNSCBN	Marion	112
245194	SOUTHERN BELL - SC (BELLSOUTH)	MARION	MARNSCMA	Marion	113
245194	SOUTHERN BELL - SC (BELLSOUTH)	MCCOLL	MCCLSCMA	Marlboro	114
245194	SOUTHERN BELL - SC (BELLSOUTH)	MULLINS	MLNSSCWP	Marion	115
245194	SOUTHERN BELL - SC (BELLSOUTH)	MT PLEASANT	MNPLSCES	Charleston	116
245194	SOUTHERN BELL - SC (BELLSOUTH)	MARIETTA	MRTTSCMA	Greenville	117
245194	SOUTHERN BELL - SC (BELLSOUTH)	N AUGUSTA	NAGSSCMA	Aiken	118
245194	SOUTHERN BELL - SC (BELLSOUTH)	NEWBERRY	NWBYSCMA	Newberry	119
245194	SOUTHERN BELL - SC (BELLSOUTH)	NEW ELLENTON	NWELSCMA	Aiken	120
245194	SOUTHERN BELL - SC (BELLSOUTH)	ORANGEBURG	ORBGSCMA	Orangeburg	121
245194	SOUTHERN BELL - SC (BELLSOUTH)	PICKENS	PCKNSCES	Pickens	122
245194	SOUTHERN BELL - SC (BELLSOUTH)	PACOLET	PCLTSCMA	Spartanburg	123
245194	SOUTHERN BELL - SC (BELLSOUTH)	PIEDMONT	PDMTSCES	Anderson	124
245194	SOUTHERN BELL - SC (BELLSOUTH)	PENDLETON	PNTNSCMA	Anderson	125
245194	SOUTHERN BELL - SC (BELLSOUTH)	PROSPERITY	PRSRSCMA	Newberry	126
245194	SOUTHERN BELL - SC (BELLSOUTH)	SALEM	SALMSCMA	Oconee	127
245194	SOUTHERN BELL - SC (BELLSOUTH)	JOHNS ISLAND	SBRKSCSK	Charleston	128
245194	SOUTHERN BELL - SC (BELLSOUTH)	SOCIETY HL	SCHLSCES	Darlington	129
245194	SOUTHERN BELL - SC (BELLSOUTH)	SENECA	SENCSCMA	Oconee	130
245194	SOUTHERN BELL - SC (BELLSOUTH)	SHARON	SHRNSCMA	York	131
245194	SOUTHERN BELL - SC (BELLSOUTH)	BOILING SPRINGS	SPBGSCBS	Spartanburg	132
245194	SOUTHERN BELL - SC (BELLSOUTH)	SPARTANBURG	SPBGSCCV	Spartanburg	133
245194	SOUTHERN BELL - SC (BELLSOUTH)	SPARTANBURG	SPBGSCMA	Spartanburg	134
245194	SOUTHERN BELL - SC (BELLSOUTH)	SPARTANBURG	SPBGSCWV	Spartanburg	135
245194	SOUTHERN BELL - SC (BELLSOUTH)	SPRINGFIELD	SPFDSCMA	Orangeburg	136
245194	SOUTHERN BELL - SC (BELLSOUTH)	ST GEORGE	STGRSCMA	Dorchester	137
245194	SOUTHERN BELL - SC (BELLSOUTH)	SUMMERVILLE	SUVLSCMA	Dorchester	138
245194	SOUTHERN BELL - SC (BELLSOUTH)	SIX MILE	SXMLSCMA	Pickens	139
245194	SOUTHERN BELL - SC (BELLSOUTH)	SENECA	TKNASCST	Oconee	140
245194	SOUTHERN BELL - SC (BELLSOUTH)	TIMMONSVILLE	TMVLSCMA	Florence	141
245194	SOUTHERN BELL - SC (BELLSOUTH)	TRAVELERS REST	TRRSSCMA	Greenville	142
245194	SOUTHERN BELL - SC (BELLSOUTH)	UNION	UNINSCMA	Union	143
245194	SOUTHERN BELL - SC (BELLSOUTH)	W COLUMBIA	WCLMSCMA	Lexington	144
245194	SOUTHERN BELL - SC (BELLSOUTH)	WHITMIRE	WHTMSCMA	Newberry	145
245194	SOUTHERN BELL - SC (BELLSOUTH)	WALHALLA	WLHLSCES	Oconee	146
245194	SOUTHERN BELL - SC (BELLSOUTH)	WESTMINSTER	WMNSSCES	Oconee	147
245194	SOUTHERN BELL - SC (BELLSOUTH)	PELZER	WMTNSCPW	Anderson	148
245194	SOUTHERN BELL - SC (BELLSOUTH)	YORK	YORKSCMA	York	149

EXHIBIT C-1



South Carolina
ETC Application
Non-Rural Telephone Company Wire Centers



Telephone Company



-  SOUTHERN BELL - SC (BELLSOUTH)
-  VERIZON SOUTH INC.-SC

EXHIBIT D

Alltel Communications, Inc.
State of South Carolina
Rural Telephone Company Service Areas
Served in their Entirety

SAC	LEC NAME	WIRE CENTER	CLLI	COUNTY	# ON MAP
240517	WINDSTREAM SC	KERSHAW	KRSHSCXB	Lancaster	150
240517	WINDSTREAM SC	LANDRUM	LNDRSCXA	Spartanburg	151
240517	WINDSTREAM SC	CAMPOBELLO	CMPBSCXA	Spartanburg	152
240517	WINDSTREAM SC	INMAN	INMNSCXA	Spartanburg	153
240517	WINDSTREAM SC	LEXINGTON	LXTNSCX	Lexington	154
240517	WINDSTREAM SC	ST MATTHEWS	STMTSCXA	Calhoun	155
240517	WINDSTREAM SC	CAMERON	CMRNSCXA	Calhoun	156
240512	BLUFFTON TELEPHONE CO. INC.	BLUFFTON	BFTNSCAQ	Beaufort	157
240512	BLUFFTON TELEPHONE CO. INC.	BLUFFTON	BFTNSCXA	Beaufort	158
240515	CHESNEE TELEPHONE CO.	CHESNEE	CHSNSCXA	Spartanburg	159
240516	CHESTER TELEPHONE CO.	LEWISVILLE	LWVLSCXA	Chester	160
240516	CHESTER TELEPHONE CO.	GREAT FALLS	GRFLSCXA	Chester	161
240516	CHESTER TELEPHONE CO.	CHESTER	CHESSCXA	Chester	162
240520	FARMERS TELEPHONE COOPERATIVE	SCRANTON	SCTNSCXA	Florence	163
240520	FARMERS TELEPHONE COOPERATIVE	LYNCHBURG	LYBGSCXA	Lee	164
240520	FARMERS TELEPHONE COOPERATIVE	TURBEVILLE	TBVLSCXA	Clarendon	165
240520	FARMERS TELEPHONE COOPERATIVE	MAYESVILLE	MYVLSCXA	Sumter	166
240520	FARMERS TELEPHONE COOPERATIVE	SUMTER	SMTRSC02	Sumter	167
240520	FARMERS TELEPHONE COOPERATIVE	KINGSTREE	NKGSSCXA	Williamsburg	168
240520	FARMERS TELEPHONE COOPERATIVE	NORTH SUMTER	NSMTSCXB	Sumter	169
240520	FARMERS TELEPHONE COOPERATIVE	WEST ANDREWS	WANDSCXA	Georgetown	170
240520	FARMERS TELEPHONE COOPERATIVE	OAKLAND	OKLDSCXA	Sumter	171
240520	FARMERS TELEPHONE COOPERATIVE	SUMTER	STBGSCXA	Sumter	172
240520	FARMERS TELEPHONE COOPERATIVE	POCALLA SPRINGS	POCLSCXA	Sumter	173
240520	FARMERS TELEPHONE COOPERATIVE	LANE	LANESCXA	Williamsburg	174
240520	FARMERS TELEPHONE COOPERATIVE	GREELEYVILLE	GRVLSCXA	Williamsburg	175
240520	FARMERS TELEPHONE COOPERATIVE	MANNING	NMNGSCXA	Clarendon	176
240520	FARMERS TELEPHONE COOPERATIVE	PINEWOOD	PNWDSCXA	Sumter	177
240520	FARMERS TELEPHONE COOPERATIVE	NORTH SUMMERTON	NSTNSCXA	Clarendon	178
240520	FARMERS TELEPHONE COOPERATIVE	BISHOPVILLE	BSVLSCAV	Lee	179
240521	FORT MILL TELEPHONE CO.	FORT MILL	FTMLSCXB	York	180
240523	HARGRAY TELEPHONE CO. INC.	HILTON HEAD ISLAND	HLHDSCXA	Beaufort	181
240523	HARGRAY TELEPHONE CO. INC.	HILTON HEAD ISLAND	HLHDSCXB	Beaufort	182
240523	HARGRAY TELEPHONE CO. INC.	HILTON HEAD ISLAND	HLHDSCXC	Beaufort	183
240523	HARGRAY TELEPHONE CO. INC.	HARDEEVILLE	HRVLSCXA	Jasper	184
240524	HEATH SPRINGS TELEPHONE CO.	HEATH SPRINGS	HTSPSCXA	Lancaster	185
240527	HOME TELEPHONE CO. INC. SC	JAMESTOWN	JMTWSCXA	Berkeley	186
240527	HOME TELEPHONE CO. INC. SC	MACEDONIA	MCDNSCXA	Berkeley	187
240527	HOME TELEPHONE CO. INC. SC	CROSS	CRSSSCXA	Berkeley	188
240527	HOME TELEPHONE CO. INC. SC	HUGER	HUGRSCXA	Berkeley	189
240527	HOME TELEPHONE CO. INC. SC	MONCK'S CORNER	MNCRSCXB	Berkeley	190
240527	HOME TELEPHONE CO. INC. SC	LEBANON	LBNNSCXA	Berkeley	191
240527	HOME TELEPHONE CO. INC. SC	HARLEYVILLE	HLVLSCXA	Dorchester	192
240528	HORRY TELEPHONE COOPERATIVE	CONWAY	FLYDSCXA	Horry	193
240528	HORRY TELEPHONE COOPERATIVE	CONWAY	LORISCXA	Horry	194
240528	HORRY TELEPHONE COOPERATIVE	WAMPEE	WAMPSCXA	Horry	195
240528	HORRY TELEPHONE COOPERATIVE	AYNOR	AYNRSCXA	Horry	196
240528	HORRY TELEPHONE COOPERATIVE	CONWAY	CNWYSCXM	Horry	197
240528	HORRY TELEPHONE COOPERATIVE	CONWAY	CNWYSCXC	Horry	198
240528	HORRY TELEPHONE COOPERATIVE	MYRTLE BCH	WMBHSCXA	Horry	199
240528	HORRY TELEPHONE COOPERATIVE	CONWAY	CNWYSCXB	Horry	200
240528	HORRY TELEPHONE COOPERATIVE	MYRTLE BCH	LKWDSCXA	Horry	201
240528	HORRY TELEPHONE COOPERATIVE	BURGESS	CLCKSCXA	Horry	202
240528	HORRY TELEPHONE COOPERATIVE	MURRELLS INLET	MRINSCXA	Horry	203

Alltel Communications, Inc.
State of South Carolina
Rural Telephone Company Service Areas
Served in their Entirety

SAC	LEC NAME	WIRE CENTER	CLLI	COUNTY	# ON MAP
240531	LANCASTER TELEPHONE CO.	LANCASTER	LNCSSCXA	Lancaster	204
240531	LANCASTER TELEPHONE CO.	FORT LAWN	FTLWSCXA	Chester	205
240532	LOCKHART TELEPHONE CO. INC.	LOCKHART	LCKHSCXA	Union	206
240533	MCCLELLANVILLE TELEPHONE CO.	MCCLELLANVILLE	MLVLSCXA	Charleston	207
240533	MCCLELLANVILLE TELEPHONE CO.	AWENDAW	AWDWSCXA	Charleston	208
240535	NORWAY TELEPHONE CO. INC.	NORWAY	NRWYSCXA	Orangeburg	209
240536	PALMETTO RURAL TELEPHONE COOP	COTTAGEVILLE	CTVLSCXA	Colleton	210
240536	PALMETTO RURAL TELEPHONE COOP	WALTERBORO	WLBOSCXE	Colleton	211
240536	PALMETTO RURAL TELEPHONE COOP	WILLIAMS	WLMSSCXA	Colleton	212
240536	PALMETTO RURAL TELEPHONE COOP	LODGE	LODGSCXA	Colleton	213
240536	PALMETTO RURAL TELEPHONE COOP	WALTERBORO	WLBOSC02	Colleton	214
240536	PALMETTO RURAL TELEPHONE COOP	HENDERSONVILLE	HNVLSCXA	Colleton	215
240539	PBT TELECOM INC.	GILBERT	GLBRSCXA	Lexington	216
240539	PBT TELECOM INC.	SWANSEA	SWNSSCXB	Lexington	217
240539	PBT TELECOM INC.	PELION	PELISCXA	Lexington	218
240539	PBT TELECOM INC.	POND BRANCH	PNBHSCXA	Lexington	219
240539	PBT TELECOM INC.	RIDGE SPRING	RDSPSCXA	Saluda	220
240539	PBT TELECOM INC.	WAGENER	WGNRSCXA	Aiken	221
240538	PIEDMONT RURAL COOP	ENOREE	ENORSCXA	Spartanburg	222
240538	PIEDMONT RURAL COOP	GRAY COURT	GRCRSCXA	Laurens	223
240538	PIEDMONT RURAL COOP	LAURENS	LRNSSCXB	Laurens	224
240538	PIEDMONT RURAL COOP	GRAY COURT	HCTVSCXA	Laurens	225
240538	PIEDMONT RURAL COOP	WATERLOO	WTRLSCXA	Laurens	226
240538	PIEDMONT RURAL COOP	WEST END	WENDSCXA	Laurens	227
240541	RIDGEWAY TELEPHONE CO.	RIDGEWAY	RDWYSCXA	Fairfield	228
240542	ROCK HILL TELEPHONE CO.	ROCK HL	RCHLSCXB	York	229
240546	SANDHILL TELEPHONE COOP	CHESTERFIELD	CHFDSCXA	Chesterfield	230
240546	SANDHILL TELEPHONE COOP	RUBY	RUBYSCXA	Chesterfield	231
240546	SANDHILL TELEPHONE COOP	PAGELAND	PGLDSCXA	Chesterfield	232
240546	SANDHILL TELEPHONE COOP	PATRICK	PTRCSCXA	Chesterfield	233
240546	SANDHILL TELEPHONE COOP	JEFFERSON	JFSNSCXA	Chesterfield	234
240546	SANDHILL TELEPHONE COOP	MC BEE	MCBESCXA	Chesterfield	235
240546	SANDHILL TELEPHONE COOP	BETHUNE	BTHNSCXA	Kershaw	236
240544	ST. STEPHEN TELEPHONE CO.	ST STEPHEN	STSTSCXB	Berkeley	237
240544	ST. STEPHEN TELEPHONE CO.	ST STEPHEN	PIVLSCXA	Berkeley	238
240544	ST. STEPHEN TELEPHONE CO.	ST. STEPHEN	BONNSCXA	Berkeley	239
240506	UTC OF THE CAROLINAS	MOUNTVILLE	MTVLSCXA	Laurens	240
240506	UTC OF THE CAROLINAS	WARE SHOALS	WRSHSCXA	Greenwood	241
240506	UTC OF THE CAROLINAS	EUTAWVILLE	ETVLSCXA	Orangeburg	242
240506	UTC OF THE CAROLINAS	NINETY SIX	NTSXSCXA	Greenwood	243
240506	UTC OF THE CAROLINAS	HODGES	HDGSSCXA	Greenwood	244
240506	UTC OF THE CAROLINAS	HOLLY HL	HLHLSCXA	Orangeburg	245
240506	UTC OF THE CAROLINAS	SALUDA	SALDSCXA	Saluda	246
240506	UTC OF THE CAROLINAS	GREENWOOD	GNWDSCXC	Greenwood	247
240506	UTC OF THE CAROLINAS	GREENWOOD	GNWDSCXB	Greenwood	248
240506	UTC OF THE CAROLINAS	BRANCHVILLE	BHVLSCXA	Orangeburg	249
240506	UTC OF THE CAROLINAS	TROY	TROYSCXA	McCormick	250
240506	UTC OF THE CAROLINAS	HAMPTON	HMPNSCXA	Hampton	251
240506	UTC OF THE CAROLINAS	ESTILL	ESTLSCXA	Hampton	252
240506	UTC OF THE CAROLINAS	ST. HELENA ISLAND	STHLSCXA	Beaufort	253
240506	UTC OF THE CAROLINAS	BEAUFORT	BUFTSCXA	Beaufort	254
240506	UTC OF THE CAROLINAS	BEAUFORT	LRBYSCXA	Beaufort	255
240506	UTC OF THE CAROLINAS	RIDGELAND	RDLDSCXA	Jasper	256
240506	UTC OF THE CAROLINAS	RIDGELAND	LWCNSCAA	Beaufort	257

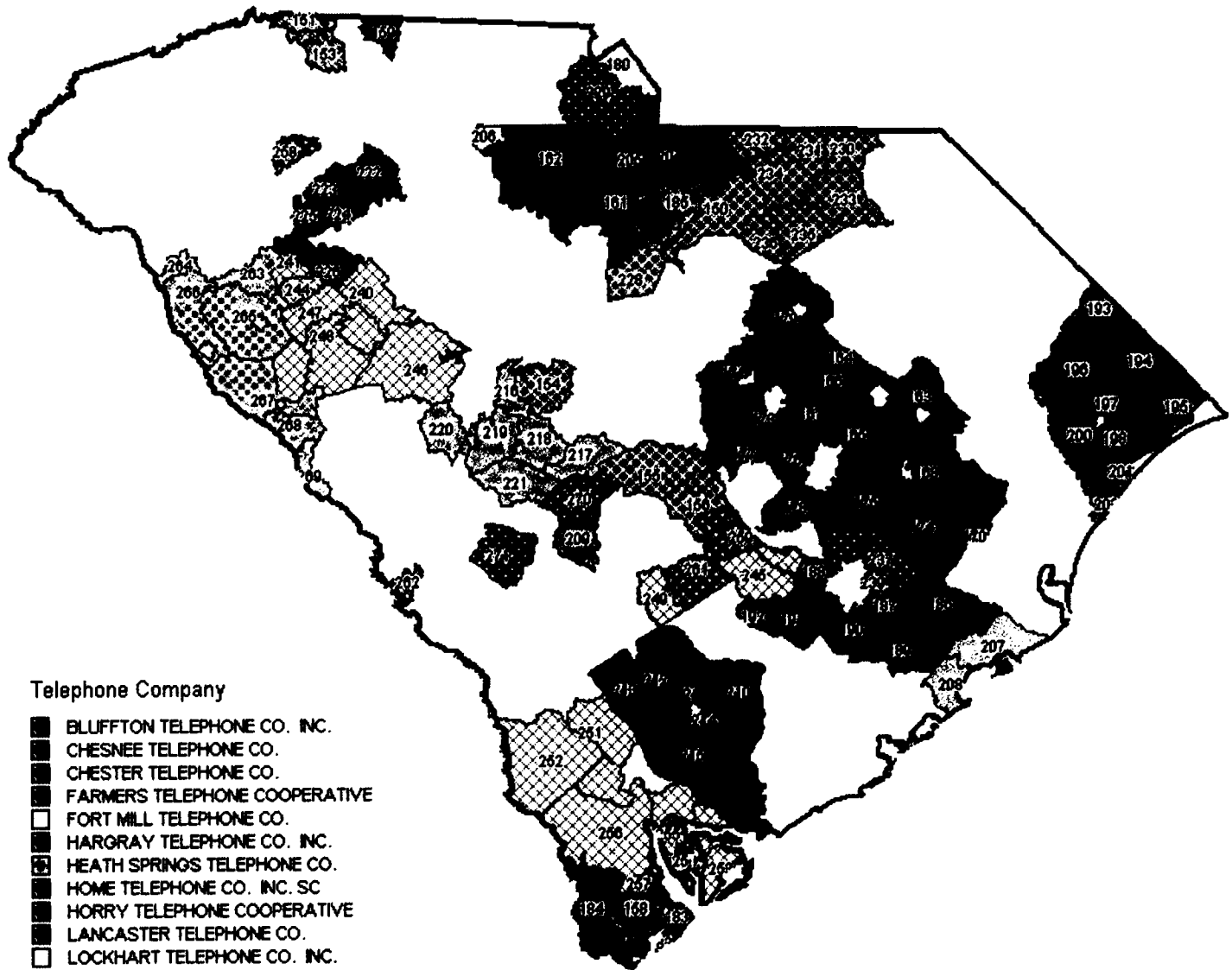
Alltel Communications, Inc.
State of South Carolina
Rural Telephone Company Service Areas
Served in their Entirety

SAC	LEC NAME	WIRE CENTER	CLLI	COUNTY	# ON MAP
240526	VERIZON SOUTH INC.-SC (CONTEL)	SIMPSONVILLE	SSVLSCXA	Greenville	258
240526	VERIZON SOUTH INC.-SC (CONTEL)	SANTEE	SANTSCXA	Orangeburg	259
240526	VERIZON SOUTH INC.-SC (CONTEL)	ELLOREE	ELLRSCXA	Orangeburg	260
240526	VERIZON SOUTH INC.-SC (CONTEL)	BOWMAN	BWMNSCXA	Orangeburg	261
240526	VERIZON SOUTH INC.-SC (CONTEL)	JACKSON	JCSNSCXA	Aiken	262
240550	WEST CAROLINA RURAL TELEPHONE CO	DUE W	DWSTSCXA	Abbeville	263
240550	WEST CAROLINA RURAL TELEPHONE CO	STARR	STRRSCXA	Anderson	264
240550	WEST CAROLINA RURAL TELEPHONE CO	WEST ABBEVILLE	WAVLSCXB	Abbeville	265
240550	WEST CAROLINA RURAL TELEPHONE CO	IVA	IVA SCXA	Anderson	266
240550	WEST CAROLINA RURAL TELEPHONE CO	MOUNT CARMEL	MTCRSCXA	McCormick	267
240550	WEST CAROLINA RURAL TELEPHONE CO	PLUM BRANCH	PLBHSCXA	McCormick	268
240550	WEST CAROLINA RURAL TELEPHONE CO	CLARKS HILL	CLHLSCXA	McCormick	269
240551	WILLISTON TELEPHONE CO.	N	NRTHSCXB	Orangeburg	270
240551	WILLISTON TELEPHONE CO.	WILLISTON	WLSTSCXA	Barnwell	271

EXHIBIT D-1



South Carolina
ETC Application
Rural Telephone Company Service Areas



Telephone Company

- BLUFFTON TELEPHONE CO. INC.
- CHESNEE TELEPHONE CO.
- CHESTER TELEPHONE CO.
- FARMERS TELEPHONE COOPERATIVE
- FORT MILL TELEPHONE CO.
- HARGRAY TELEPHONE CO. INC.
- HEATH SPRINGS TELEPHONE CO.
- HOME TELEPHONE CO. INC. SC
- Horry TELEPHONE COOPERATIVE
- LANCASTER TELEPHONE CO.
- LOCKHART TELEPHONE CO. INC.
- MCCLELLANVILLE TELEPHONE CO.
- NORWAY TELEPHONE CO. INC.
- PALMETTO RURAL TELEPHONE COOP
- PBT TELECOM INC.
- PIEDMONT RURAL COOP
- RIDGEWAY TELEPHONE CO.
- ROCK HILL TELEPHONE CO.
- SANDHILL TELEPHONE COOP
- ST. STEPHEN TELEPHONE CO.
- UTC OF THE CAROLINAS
- VERIZON SOUTH INC.-SC (CONTEL)

EXHIBIT E



**South Carolina
ETC Application
Rural and Non-Rural Wire Centers
Where Alltel is Requesting ETC Designation**



-  NonRural Wire Centers
-  Rural Wire Centers